

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ONE WISCONSIN INSTITUTE, INC., CITIZEN ACTION
OF WISCONSIN EDUCATION FUND, INC., RENEE M
GAGNER, ANITA JOHNSON, CODY R. NELSON, JENNIFER
S. TASSE, SCOTT T. TRINDL, MICHAEL R. WILDER,
JOHNNY M. RANDLE, DAVID WALKER, DAVID APONTE,
and CASSANDRA M. SILAS,

Plaintiffs,

vs. Case No. 15-c v-324-jdp

MARK L. THOMSEN, ANN S. JACOBS, BEVERLY R.
GILL, JULIE M. GLANCEY, STEVE KING, DON M.
MILLS, MICHAEL HAAS, MARK GOTTLIEB, and
KRISTINA BOARDMAN, all in their official
capacities,

Defendants.

JUSTIN LUFT, et al., on behalf of themselves
and all others similarly situated,
Plaintiffs,

v. Case No. 20-cv-768-jdp

TONY EVERS, et al.,
Defendants.

REMOTE VIDEOTAPED DEPOSITION OF MEAGAN WOLFE

September 2, 2020

9:01 a.m. to 12:20 p.m.

REPORTED BY ANITA KORNBURGER

REGISTERED PROFESSIONAL REPORTER

HUDSON COURT REPORTING & VIDEO 1-800-310-1769

A P P E A R A N C E S

WISCONSIN DEPARTMENT OF JUSTICE, by
Mr. S. Michael Murphy
17 West Main Street
Madison WI 53707-7857
608-266-5457
murphysm@doj.state.wi.us
Appearing by videoconference on behalf of the
Defendants.

ACLU WI FOUNDATION, by
Ms. Karyn L. Rotker
207 East Buffalo Street, Suite 325
Milwaukee WI 53202-5774
414-272-4032
krotker@aclu-wi.org
Appearing by videoconference on behalf of the Luft
Plaintiffs.
PERKINS COIE, by
Ms. Amanda R. Callais
700 13th Street NW, Suite 800
Washington, D.C. 20005-3960
202.654.6396
acallais@perkinscoie.com
Appearing by videoconference on behalf of the
One Wisconsin Plaintiffs.

I N D E X

Examination by Page

Ms. Rotker. 6
Ms. Callais. 94

E X H I B I T S

| Exhibit No. | Description | Page Identified |
|-------------|----------------------------------|-----------------|
| 5000 | Not properly identified. | 13 |
| 5001 | Not properly identified. | 37 |

E X H I B I T S

| Exhibit No. | Description | Page Identified |
|-------------|--|-----------------|
| 5002 | Direct contact mailer. | 44 |
| 5003 | Bring It To The Ballot website printout. | 48 |
| 5004 | E-mail chain. | 49 |
| 5005 | Photo of acceptable photo IDs for voting in Wisconsin. | 53 |
| 5006 | WEC website printout. | 54 |
| 5007 | Frequently asked questions on the WEC website. | 55 |
| 5008 | Wisconsin Voting Deadlines and Facts for November 2020. | 57 |
| 5009 | Document issued by the Wisconsin Election Commission. | 58 |
| 5010 | Press release issued in February. | 60 |
| 5011 | 37-page photo ID informational guide. | 64 |
| 5012 | Document produced to show where in overall outreach plan IDPP is specifically talked about. | 74 |
| 5013 | Not properly identified. | 81 |
| 5014 | Wisconsin Department of Health Services document talking about internet access and/or the lack thereof for different categories of people. | 91 |
| 5015 | Wisconsin Policy Forum document. | 92 |

E X H I B I T S

| Exhibit No. | Description | Page Identified |
|-------------|---|-----------------|
| 5016 | Broadband map of unserved areas. | 93 |
| 5017 | 2016 report filing submitted with the court. | 119 |

(Original exhibits attached to original transcript.
Copies provided to all counsel.)

R E Q U E S T S

| By | Description | Page |
|------------|--|------|
| Ms. Rotker | Distribution list with list of organizations. | 28 |

1 TRANSCRIPT OF PROCEEDINGS
 2 THE VIDEOGRAPHER: Okay. Good morning.
 3 We are on the record at 9:01 a.m. Central daylight
 4 time on Wednesday, September 2, 2020, for the
 5 stenographically reported and videotaped deposition
 6 of Ms. Meagan Wolfe in the action One Wisconsin
 7 Institute, Inc. et al., verse Mark L. Thomsen, et
 8 al, and the consolidated case of Luft Evers.
 9 My name is Pavan Sundrani, the
 10 videographer, and Ms. Anita Kornburger is the
 11 deposition officer and shorthand reporter. We are
 12 with Hudson Court Reporting, located at 90
 13 Woodbridge Center Drive, Suite 240, Woodbridge, New
 14 Jersey.
 15 This deposition is being taken
 16 remotely, with all parties attending via the Zoom
 17 video conferencing.
 18 Would all counsel please identify
 19 themselves for the record and stipulate your
 20 acceptance of taking this deposition by remote
 21 means.
 22 MS. ROTKER: Karyn Rotker, ACLU of
 23 Wisconsin, and I do stipulate to taking it by
 24 remote means.
 25 MR. MURPHY: Mike Murphy from the

1 Wisconsin Department of Justice representing
 2 defendants in these consolidated cases and Meagan
 3 Wolfe in this deposition. I do consent to Zoom
 4 remote deposition this morning.
 5 MS. CALLAIS: Amanda Callais, Perkins
 6 Coie, representing the One Wisconsin plaintiffs.
 7 And I consent to taking this deposition remotely.
 8 MS. ROTKER: And I probably should have
 9 been clear that I'm representing the Luft
 10 plaintiffs.
 11 THE VIDEOGRAPHER: Ms. Reporter, you may
 12 swear in the witness.
 13 MEAGAN WOLFE, called as a witness
 14 herein, having been first duly sworn on oath, was
 15 examined and testified as follows:
 16 E X A M I N A T I O N
 17 BY MS. ROTKER:
 18 Q. Thank you. Good morning, Ms. Wolfe. And
 19 thank you for taking time out of your busy schedule
 20 for us. Can you please state your full name for
 21 the record?
 22 A. Meagan Wolfe. Meagan is M-E-A-G-A-N.
 23 Wolfe is W-O-L-F-E.
 24 Q. And your title and address?
 25 A. I am the administrator of the State of

1 Wisconsin Elections Commission, and also the chief
 2 election official for the State of Wisconsin.
 3 Would you like our office address?
 4 Q. Yes.
 5 A. Our office is at 212 East Washington
 6 Avenue, third floor, Madison, Wisconsin.
 7 Q. Great. Thank you very much. I know
 8 you've been deposed before, so I'm not even going
 9 to ask you if you have. Just quickly go through a
 10 couple of ground rules for today's deposition. I'm
 11 sure you know that you need to respond verbally,
 12 that the court reporter cannot take down gestures;
 13 right?
 14 A. Yes.
 15 Q. And so that we can get a clear record,
 16 let's try not to talk over each other. I will try
 17 not to start a question until you're completely
 18 done with your answer, and vice-versa.
 19 A. Great.
 20 Q. Great. And if you don't hear a question
 21 or understand a question, please say so and I'll
 22 repeat or rephrase it for you, okay?
 23 A. Great. Thank you.
 24 Q. If you want to take a break, also please
 25 say so. The only thing we'll ask is that you

1 finish answering any question that I've asked
 2 before you go ahead and take a break.
 3 A. Yes.
 4 Q. Okay. And your counsel may object to
 5 some of the questions I ask you today, but unless
 6 he instructs you not to answer, you still go ahead
 7 and answer. Okay?
 8 A. Yes.
 9 Q. Okay. And is there any reason that you
 10 might not be able to testify fully and accurately
 11 and truthfully today?
 12 A. No, there's no reason.
 13 Q. Okay. Great. What did you do to prepare
 14 for today's deposition?
 15 A. Well, I looked -- I refreshed myself on
 16 some of the documentation that we had submitted.
 17 But beyond that, I had a brief conversation with
 18 Mike.
 19 Q. Okay. And by "Mike," you mean your
 20 attorney, Mr. Murphy?
 21 A. That's correct, yes.
 22 Q. Okay. And -- but when you say
 23 documentation you had submitted, is that the
 24 documents you sent to the plaintiffs?
 25 A. Correct, yes.

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1 Q. Okay. And other than your counsel, did
2 you meet with anyone to prepare for today's
3 deposition?
4 A. No, I did not.
5 Q. Okay. Thank you. How long have you
6 worked for the Wisconsin Elections Commission?
7 A. Well, my career with the Wisconsin
8 Elections Commission spans about the length of this
9 case. I began in 2011.
10 Q. Okay. And what did you begin as?
11 A. I began as our voter outreach
12 specialist --
13 Q. Okay.
14 A. -- in voter ID law.
15 Q. Okay. And how long did you have that
16 position?
17 A. I held that position for about four
18 years.
19 Q. Okay. And did -- oh, let me just clarify
20 a couple of shorthands for the record. Can we
21 agree that IDPP, the ID petition process, if I say
22 IDPP, that's the same thing?
23 A. Yes.
24 Q. And also if I say WEC, that's the
25 Wisconsin Elections Commission; right?

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1 A. Yes.
2 Q. Okay. So when you were a voter ID
3 specialist, did IDPP exist during that period of
4 time?
5 A. No, it did not.
6 Q. Okay.
7 A. Originally.
8 Q. Right. And then after -- what was your
9 next position with the elections commission?
10 A. So I continued doing voter outreach, and
11 I also took on some additional roles, such as
12 project management of our public-facing technology,
13 namely the design and implementation of the My Vote
14 Wisconsin website.
15 Q. Okay. And how long did you do that for?
16 A. Well, probably about three or so years.
17 And then I became our deputy administrator.
18 Q. And when was that? So that was about
19 2016, 2017?
20 A. Correct, yes.
21 Q. 20 --
22 A. Early 2017, late 2016. 2016 I think is
23 when that happened.
24 Q. Okay. And when did you become the
25 administrator?

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1 A. In 2018. February of 2018.
2 Q. So you've been administrator for about
3 two-and-a-half years now?
4 A. Yes, that's correct.
5 Q. Great. So what are your duties now as
6 the administrator?
7 A. To oversee the Wisconsin Elections
8 Commission as an agency. We're a rather small
9 agency, so I'm quite involved still in our
10 technology initiatives as well as our voter
11 outreach initiatives. A main core responsibility
12 of mine is to represent the agency, so I often do
13 our media outreach, I do a lot of public
14 appearances, things like that. But also everything
15 from, you know, coordinating HR to managing the
16 budgets, and pretty much everything in between.
17 Q. Okay. That's a lot of things. When you
18 say that you are involved in the outreach campaign,
19 could you talk a little more to me or talk a little
20 more about what that means?
21 A. Sure. So because -- I guess because I
22 previously held that position, I still am involved
23 in helping to direct some of our -- our voter
24 outreach programs. I still am mainly the one that
25 will go talk to voter groups, let's say the League

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1 of Women Voters; or someone needs a speaker, I'll
2 typically be the one that handles that type of
3 thing, as well as helping to review and coordinate
4 some of our voter outreach efforts, be it social
5 media planning or whatnot.
6 We do have staff that also helps to
7 draft those things, but I still am involved in the
8 direction and the ultimate approval of those
9 initiatives, of course with the approval and
10 consent of the commission, if it's a major
11 initiative.
12 Q. Sure. And hang on, I'm just changing the
13 order here a little bit. So you are aware that WEC
14 has an obligation under Wisconsin law to engage in
15 outreach to identify and contact groups of voters
16 who may need assistance in obtaining or renewing a
17 document that constitutes proof of identification
18 for voting and provide assistance to the electors
19 in obtaining or renewing that document; right? Are
20 you aware of that?
21 MR. MURPHY: Object to form.
22 MS. ROTKER: We can pull -- so just so
23 everyone understands the way the documents are
24 going to work, I'm not -- we have them internally
25 numbered. So if I say doc 20, that's for

Pages 9 to 12

1 Alexandra's benefit, and then we'll pull them up
2 and number them as exhibits in this.
3 So Alexandra, doc 20, please. And
4 then she's going to pull that up on Agile Law. And
5 we're marking that as Exhibit 5000. Again, just
6 for the record, it's to make sure that we're past
7 any other exhibits in either of the consolidated
8 cases. We're just starting the numbering sort of
9 farther along.
10 BY MS. ROTKER:
11 Q. So can you see the document that is
12 Exhibit 5000, or do you need it --
13 A. No, unfortunately I cannot. It's really
14 grainy. Could we -- oh, let's see, it looks like I
15 can zoom in. Okay, I've zoomed in and I can see it
16 now, yes.
17 Q. Okay. So can you go down to -- we're
18 looking for sub twelve. And it's probably closer
19 to page 3 of the document. Go up. I saw it right
20 there where -- I think higher up on that page.
21 A. Got it. I am seeing sub twelve,
22 assistance in obtaining proof of identification.
23 Q. Right. So are you aware of that law?
24 A. Yes.
25 Q. Okay. That was what I wanted to know.

1 website. And then if you look at any of our
2 training, be it to do with absentee voting, which
3 of course now almost 80 percent of Wisconsin
4 electors in the most recent statewide election
5 participated using that method, or if it's to do
6 with the My Vote Wisconsin website, or our voter
7 outreach materials that are on the elections.wi.gov
8 website, you know, there's terms used in there
9 about if you need assistance getting a photo ID,
10 the DMV may be able to assist for free. I don't
11 have it in front of me our exact phrase that we
12 use, but it's integrated anywhere where we talk
13 about photo ID.
14 Q. Okay. So when you say -- I'm sorry, I
15 was hearing a little echo from myself.
16 When you say outreach, have you done
17 any -- you know, you mentioned earlier, say,
18 speaking with the League of Women Voters. Have you
19 done, since November 9, 2016, any -- have you or
20 WEC done direct outreach such as presentations to
21 organizations on IDPP?
22 A. I mean, we would never just talk about
23 just IDPP. That would be a very short
24 presentation. But it's certainly been something
25 that we've continued to do. If we're invited to

1 So thank you. How have you fulfilled that specific
2 obligation since 2016?
3 A. As we've submitted in previous
4 documentation and in the plan that we have
5 submitted as we head into November 2020, a photo ID
6 outreach IDPP is integrated into all of our
7 training and our voter outreach materials. We also
8 have some specific resources, such as the IDPP palm
9 card, we have the Bring It to the Ballot website,
10 BringIt.wi.gov, that focuses exclusively on photo
11 ID.
12 We also have a very extensive customer
13 service help desk in terms of a toll-free number
14 and e-mail addresses that voters can contact. And
15 we help assist them through the process to provide
16 them information or help them navigate the process.
17 Q. Okay. I'm going to delve a little more
18 into some of the specifics. So specifically on
19 photo ID and IDPP. Have you had any specific
20 outreach campaign since the November 9, 2016 --
21 since after the 2016 elections?
22 A. So all of the same initiatives that were
23 in place then still remain. So in terms of the
24 IDPP palm card, I believe that's what we're calling
25 it, or flyer, and the Bring It to the Ballot

1 talk with a group or present, we will do that. And
2 photo ID is, of course, part of that presentation.
3 Q. And IDPP is always part of what you talk
4 about with photo ID?
5 A. It's always -- it's certainly a prevalent
6 talking point in terms of what are the options for
7 a voter who may not be able to obtain a photo ID
8 through the normal process. So yes.
9 Q. And how many staff do you have to -- paid
10 staff to conduct outreach?
11 A. I would say we have very few staff that
12 focuses exclusively on that. We're a very small
13 team. We have 37 full-time employees. And so we
14 do a lot of outreach events or, you know, clerk
15 training events, public speaking engagements. I'm
16 usually the main person that does those. But also
17 our public information officer.
18 We also have a staff member, an
19 elections specialist, that does some of our voter
20 outreach as well. So it -- you know, it depends on
21 what else we have going on. But we have a number
22 of staff that can step in in that role.
23 Q. And just to clarify for the record, your
24 public relations specialist is Reid Magney; is that
25 correct?

1 A. He's our public information officer, yes.
 2 Q. Public information officer. And then
 3 who's your voter specialist? I'm sorry, I didn't
 4 catch the name of that.
 5 A. Sure. Riley Willman is the -- has
 6 assumed a lot of my former duties in terms of voter
 7 outreach.
 8 Q. And how many presentations in 2020 have
 9 you done?
 10 A. I don't know. You know now, most things
 11 are virtual. But I have done some virtual
 12 presentations with groups in 2020. I don't have a
 13 count.
 14 Q. Okay. So let's -- excluding the clerks,
 15 but just, you know, other voter organizations, do
 16 you think it's more than ten, less than ten?
 17 A. You know, I think in 2020 it's
 18 probably -- if we're talking about Wisconsin-based
 19 voter outreach groups, we've actually received very
 20 few invitations. But there have been a few. You
 21 know, there's -- we've had conversations with
 22 various groups to talk about their voter outreach
 23 efforts or what we have available. So probably
 24 around ten, if I had to guess. But that's not an
 25 exact number.

1 Q. So it sounds like from what you're saying
 2 that you wait for groups to invite you to speak.
 3 Is that how the process works?
 4 A. No, not typically. So typically
 5 we -- you know, during non-Covid times we would be
 6 actively engaging with those groups to go speak at
 7 events. But right now, as everything's being
 8 migrated to virtual platforms, you know, we would
 9 have to see what events are being conducted.
 10 Also, I would say that we are
 11 arranging actual walk-through events with voter
 12 outreach groups, where we will invite them to be a
 13 part of the event so that we can show them all the
 14 various outreach materials that we have, not just
 15 for IDPP, but for all of our voter outreach
 16 materials. I'd answer their questions, hear about
 17 their initiatives, and allow them to hear about our
 18 initiatives as well.
 19 And so that's something that we're
 20 doing to try to accommodate for the fact that now
 21 most things are virtual and there aren't those
 22 in-person opportunities that we historically had.
 23 Q. So -- and thank you. And we'll get back
 24 to that a little later.
 25 Is there any effort in 2020 to reach

1 groups serving homeless people?
 2 A. Not specifically.
 3 Q. Is there any effort to reach groups
 4 focused on people with limited educational
 5 abilities?
 6 A. I don't know that specifically. We have
 7 extensive contact and interaction with our
 8 accessibility advisory committee who represents a
 9 wide array of people who face various challenges.
 10 But I don't know specifically that we've met with a
 11 group just on that particular topic.
 12 Q. So you don't know -- in terms of people
 13 with disabilities, you haven't done a specific ID
 14 or IDPP presentation in 2020?
 15 A. I believe we have discussed that -- yes,
 16 we have discussed photo ID and IDPP with our
 17 accessibility advisory committee.
 18 Q. With the -- okay.
 19 A. And it does cover people with cognitive
 20 disabilities as well.
 21 Q. And that advisory committee consists
 22 of -- is that on your website? Or who's on that
 23 advisory committee?
 24 A. Yes, it's on our website. It's a
 25 longstanding committee. And we do -- they do just

1 excellent important work helping to advise many of
 2 our programs and make sure that we can spread
 3 information to the groups that they work with.
 4 Q. What efforts have you made to contact
 5 groups that serve the black community?
 6 A. So I've actually been having quite
 7 regular meetings with a group from Milwaukee. I
 8 don't know that the group itself has a name, but
 9 it's -- it's some 20 organizations that represent
 10 organizations that represent black individuals in
 11 the Milwaukee area. A Ms. Jasmine Johnson is the
 12 one that organizes those. And we have evening
 13 meetings. I believe I have my fourth one in 2020
 14 coming up next week.
 15 So we meet on a pretty regular basis
 16 to discuss just this, what are our voter outreach
 17 initiatives and what kind of things can we
 18 coordinate on, or what are their outreach efforts.
 19 And there's between 15 and 20 different
 20 organizations that are usually represented at those
 21 meetings.
 22 Q. And what role does -- again, specifically
 23 discussing photo ID and IDPP -- play in that, in
 24 those?
 25 A. Sure.

1 Q. In general, I mean.

2 A. Often we're discussing what we have
3 available for voter outreach materials. So talking
4 about what's available on the Bring It to the
5 Ballot site, discussing, you know, IDPP process,
6 but of course, you know, discussing at length many
7 of the other voter outreach initiatives that are
8 also going on right now. So I would not say that
9 it's photo ID exclusive. But we've certainly had
10 those discussions about different photo outreach
11 efforts in that arena as well.

12 Q. And that's only for Milwaukee; correct?

13 A. I believe -- you know, you will have to
14 forgive me, I don't know that they officially have
15 a name, but it's -- it's Milwaukee based, but I
16 believe it covers more than just the Milwaukee
17 area.

18 Q. What about for Latinx persons, what
19 efforts and outreach is going on?

20 A. So specifically I don't know that we've
21 had any specific contacts in 2020. I'm not
22 aware -- I don't believe my -- myself have done any
23 outreach efforts with that community specifically.

24 Q. What about Hmong?

25 A. Again, I don't believe that we've done

1 any specific outreach with groups. However, all of
2 our materials are maintained in both Spanish and
3 Hmong, including the My Vote Wisconsin website.
4 And so we've done some pretty significant review of
5 the Spanish language versions of those pages.

6 We've also ensured that we have
7 Spanish language assistance in our office as well
8 to assist voters who are navigating the site or who
9 are navigating the Bring It site to make sure that
10 they have access to the information.

11 Q. So the My Vote site, though, isn't really
12 the site that talks about IDPP; correct? That
13 would be the Bring It site?

14 A. You know, the My Vote site is a
15 functional site, and so -- people come to our
16 website to do things. And I think that's actually
17 really important. People come to our site to
18 register to vote, to request an absentee ballot.
19 And ingrained in that site throughout is
20 information about photo ID, information about IDPP
21 or how there's, you know, other ways to obtain an
22 ID, and they're in the relevant places where people
23 are going to do the thing. And so there certainly
24 is information on that site.

25 Q. So is everything on the Bring It site

1 available in Spanish, including the landing pages
2 and all the information?

3 A. Much of the information, such as the IDPP
4 handout, posters, flyers, brochures, a lot of the
5 information, radio ads, videos, are available in
6 Spanish. I do not -- I do not remember if the home
7 page is available in Spanish or not.

8 Q. Okay. And what about in Hmong?

9 A. No, it is not available in Hmong.

10 Q. Okay. And again, we'll get back to the
11 Bring It website a little later.

12 Is there any specific outreach that
13 you have made to tribal communities, Native
14 American communities, about ID and IDPP?

15 A. No, not specifically in 2020.

16 Q. Okay. And what about groups serving
17 senior citizens?

18 A. Yes, I would say through our
19 accessibility advisory committee there's been some
20 pretty extensive outreach. We work with them to,
21 again, coordinate on training, messaging to voters,
22 and they also represent the aging community.

23 Q. Okay. Were -- are all of your
24 presentations given in English?

25 A. Mine, yes. Unfortunately. My Spanish

1 isn't very good.

2 Q. And what about your other staff members
3 who do presentations?

4 A. Actually, the chair of our commission
5 speaks Spanish, and she's given some interviews
6 of -- recently in Spanish.

7 Q. But presentations to organizations like
8 you're talking about as outreach, it's basically in
9 English; is that correct?

10 A. Yes, we have not done any in Spanish in
11 2020. We have in the past, but not in 2020.

12 Q. Do --

13 A. I think you froze.

14 Q. Did you -- I don't know if it's just me,
15 but Ms. Wolfe froze. Sorry, you froze for a second
16 there.

17 A. No, I think you froze.

18 Q. Oh, that's so weird. I could see myself
19 moving. So sorry about that. Let me just repeat
20 the question.

21 Do you have a list of organizations
22 serving the kinds of groups that we're talking
23 about: homeless people, Latinx community, Hmong
24 community, people separate from your advisory
25 committee, people with disabilities? I mean, is

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1 there, like, sort of a master list of all these
 2 groups around the state?
 3 A. Yes, I believe there is a list. There's
 4 a distribution list, yes.
 5 Q. Have you in 2020 affirmatively sent the
 6 ID and IDPP materials to all those groups
 7 and -- well, let's answer that question first.
 8 A. Have we sent IDPP specifically to the
 9 distribution list in 2020? I do not believe so. I
 10 could double-check. I do not believe we've sent
 11 that flyer again to them in 2020. But I know we
 12 have sent them multiple training programs, and
 13 I -- I don't remember if that was included. But I
 14 can find out.
 15 Q. So -- and when you say training, I mean,
 16 the training includes a lot of information; right?
 17 A. A lot of information, including photo ID,
 18 correct.
 19 Q. Including photo ID. But if it's not
 20 focused on photo ID and IDPP, is it possible that
 21 might be buried in, you know, a very long training?
 22 MR. MURPHY: Object to form.
 23 BY MS. ROTKER:
 24 Q. You can answer.
 25 A. There is significant training, but I also

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1 think that for a lot of those individuals, they're
 2 participating by absentee, and they're also
 3 indefinitely confined. So those are quite
 4 different -- there might be different things that
 5 are important to that specific group of people.
 6 And so I think for -- for them we need to make sure
 7 that they get that information, because it's very
 8 important.
 9 BY MS. ROTKER:
 10 Q. Of course. But are you saying then in
 11 2020 more of the training has focused on people who
 12 would use the indefinitely confined exception
 13 rather than IDPP?
 14 A. Well -- I'm sorry, I don't know if I can
 15 quantify the amount of training for something. I
 16 don't think the amount of training, us evaluating
 17 it, by any means, it's in response to voter
 18 behavior in 2020 where, again, we saw almost more
 19 than 80 percent of people participate by absentee
 20 in the August election.
 21 Q. Sure. But of those people who
 22 participate, what percentage roughly, if you know,
 23 would participate as indefinitely confined?
 24 A. We do have those numbers available on our
 25 website. It's actually quite a significant number

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1 of people that have now identified as indefinitely
 2 confined in 2020. But we do have that data. I
 3 don't have it in front of me.
 4 Q. Okay. So if I were to look at your
 5 website I could trust that the data on the website
 6 is accurate?
 7 A. Yes, absolutely. We even put out an
 8 April 7, 2020 absentee voting report that's a very
 9 detailed, granular view of the absentee process.
 10 And we have supplementary data as part of that.
 11 Q. Sure. And I totally understand that.
 12 But there are also many voters or most voters who
 13 will require ID to vote even to vote absentee by
 14 mail, isn't that true?
 15 A. For the first -- so the first time a
 16 voter votes by absentee ballot, they have to
 17 provide a photo ID. You'll also see, of course,
 18 that base of people that have already provided a
 19 photo ID in the past is, of course, growing, and
 20 there's a very significant number of people that
 21 already have an absentee ballot request on file for
 22 November because they completed a calendar year
 23 with us.
 24 Q. But if people move they also have to get
 25 and provide ID again; right?

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1 A. Well, not exactly. If they reregister.
 2 So you have to provide a new photo ID with your
 3 new -- your first absentee request under your new
 4 registration.
 5 Q. Yes, that's what --
 6 A. But there are nuances like intent to
 7 return, or if you don't yet qualify at your new
 8 address, you're still eligible to vote from your
 9 old address.
 10 Q. Yeah, thank you. That's what I meant by
 11 move. So that makes sense. So do you have --
 12 MS. ROTKER: And I'm going to actually
 13 ask if counsel will produce -- you said you have a
 14 list of organizations on the distribution list.
 15 That was not given to us, and I'm asking if you
 16 will agree to produce that.
 17 MR. MURPHY: Counsel, we'll take that
 18 request under advisement. I'll get back to you
 19 after the deposition.
 20 MS. ROTKER: Okay.
 21 BY MS. ROTKER:
 22 Q. So when you send materials to these
 23 people on the distribution list, do you also offer
 24 to do trainings?
 25 A. Yes. Yes, we do. I mean, it depends on

Pages 25 to 28

1 what the initiative is, but we've certainly done
 2 trainings in the past. We've coordinated with them
 3 on things like videos. Again, now in the virtual
 4 world, you know, a lot of video content is much
 5 more useful to people.
 6 Q. And again, we will get to that in a
 7 little bit. But when you send materials to these
 8 organizations are you basically sending it to
 9 groups and organizations that have digital access?
 10 You're sending e-mail links or things like that, or
 11 are you actually sending hard paper copies of
 12 documents in 2020?
 13 A. We're sending an electronic version.
 14 Historically, and I can vouch for this, even in
 15 pre-Covid times, nobody wanted our paper.
 16 Q. Do you know -- are you familiar with KW2?
 17 A. Yes.
 18 Q. And that is a subcontractor who works on
 19 some of your advertising or kinds of campaigns;
 20 right?
 21 A. Correct.
 22 Q. Okay. Do you know whether they have a
 23 list of organizations for outreach?
 24 A. I would assume they do.
 25 Q. Have you used that list in 2020 to send

1 information on ID and IDPP to groups on that list?
 2 A. No.
 3 Q. Why not?
 4 A. I don't believe that's something that
 5 we've done in the past either.
 6 Q. But the -- okay. Let me move on. There
 7 are -- actually, before I get to that.
 8 You said that you have a hotline, an
 9 ID -- is it just a voter ID hotline? Or what is
 10 the WEC's hotline?
 11 A. So we have 1-866-VOTE-WIS, which is our
 12 toll-free number, and it covers a variety of
 13 topics. So, you know, again, we have a very small
 14 staff, so when you call our office, you're given
 15 options about what you might want to speak to
 16 somebody about. And that number is put on, you
 17 know, all of our public outreach materials.
 18 We also coordinate with a call center,
 19 Beyond Division, and they help to assist us with
 20 some of the voter-related questions as well. This
 21 allows them to help us with some of the more basic
 22 questions so that our staff with more expertise can
 23 help people navigate some of the more nuanced
 24 things like photo ID.
 25 Q. Is the hotline advertised as something

1 specifically that can assist people with photo ID?
 2 A. I believe so. In our photo ID materials,
 3 that number is advertised.
 4 Q. And when you say your photo ID materials,
 5 what do you mean by that?
 6 A. Everything you'll find on the Bring It to
 7 the Ballot site, everything in our voter
 8 information center on elections.wi.gov, any of our
 9 materials that we have available.
 10 Q. Okay. And we'll talk a little more about
 11 that. Let me just go back to the groups for a
 12 minute. When you share materials or do
 13 presentations for organizations, you don't have a
 14 budget to pay them to do, you know, outreach; is
 15 that correct?
 16 A. I'm sorry, to pay who?
 17 Q. The -- say an organization serving the
 18 black community. Do you pay them to ensure that ID
 19 and IDPP gets done?
 20 A. No.
 21 Q. So basically it's a situation where
 22 you're giving materials to volunteer groups who
 23 are -- then need to use their own resources to
 24 share that information; is that correct?
 25 MR. MURPHY: Object to form, but answer.

1 THE WITNESS: We will provide them with
 2 materials. Most of them are, you know, virtual
 3 materials, or we're always willing to help do any
 4 of the engagement if they'd like. If they'd like
 5 us to come speak as a subject matter expert or be
 6 involved, we're always willing to do that as well.
 7 BY MS. ROTKER:
 8 Q. Are you willing and have you ever, you
 9 know, gone out and spoken with individual voters as
 10 opposed to the organizations?
 11 A. Yes. I spent years on the road going out
 12 and talking to individual voters. But in 2020, no,
 13 with the Covid circumstances, that's not possible.
 14 Q. Has that -- has WEC done individual voter
 15 contact since 2018 on ID and IDPP?
 16 A. I think it would be difficult to define
 17 what an individual voter outreach is. But we'll go
 18 talk to groups. I mean, I've been in a library or
 19 a community center where we've discussed elections
 20 and various things, including photo ID and IDPP.
 21 So I think yes, we've certainly reached out to
 22 individual voters about that in the last few years.
 23 Q. Okay. Do you have a list of the
 24 presentations -- you said that you made you thought
 25 maybe about ten presentations in 2020 to

1 organizations. Do you have a list of those
2 presentations?

3 A. I do not. No, I do not. It's been quite
4 a year, as you might imagine, and keeping a list
5 has not made it on my list.

6 Q. Does anyone at WEC keep track of that?

7 A. You know, we have not kept super close
8 track of the various presentations. We could
9 probably try to recreate our calendars, but I --
10 no, I don't have a list available. It wouldn't be
11 a document we have.

12 Q. Okay. Who -- do you have WEC staff in
13 charge of responding to the individual voter
14 questions?

15 A. Yes. But again, we're a very small team,
16 and so everybody has to have some basic
17 understanding. But I would say our election
18 administration team is mainly responsible for
19 helping with voter-type questions that have to do
20 with things like photo ID, voter registration,
21 absentee voting.

22 There's a lot of staff then that's
23 more specialized in the statewide voter
24 registration database or some of our technology.
25 And then of course myself or our legal team or

1 management team also assists with a lot of those
2 questions from voters, or policy questions.

3 Q. Okay. So let's go back a little bit. We
4 spoke earlier about KW2, your -- could you -- do
5 you call them a public relations contractor,
6 advertising contractor?

7 A. I would say they're a, yes, an ad agency
8 that we work with through the state contract.

9 Q. And you've -- and WEC has used them for a
10 long time, right? For some years?

11 A. Yes. We began working with them with the
12 Bring It to the Ballot photo ID outreach.

13 Q. In 2020, what is their role?

14 A. Their role is to help us with
15 the -- well, a couple of things. One, we did a
16 statewide survey to understand where voters go for
17 information, who they trust, what types of
18 information they're looking for, and that helped us
19 to be able to then coordinate some of the
20 messaging, the tool kits that we're putting
21 together for local election officials.

22 So that was the first effort is, you
23 know, finding out from our voters what types of
24 information they need and where they go for that
25 information. So I think that's been really

1 valuable, rather than us venturing a guess about
2 that. And then they've been helping us with the
3 creation of materials in line with what we learned
4 from the public survey.

5 Q. Do any of those materials address ID and
6 IDPP?

7 A. We certainly make note of the fact that
8 if, you know -- again, it's gotta be useable. So
9 IDPP is meaningless to most voters. And so I think
10 the phrase that we use throughout our materials is,
11 you know, if you're having a hard time getting a
12 photo ID, DMV may be able to -- or we'll be able to
13 assist for free. You have to look at our materials
14 for the exact phrase. But when we talk about photo
15 ID, we make sure to include that description as
16 well.

17 Q. And are there materials being created --
18 you know, you said you were working with KW2 on
19 materials. Are any of the materials they're
20 working on in 2020 dealing with ID and IDPP?
21 Understanding they may not use the word IDPP.

22 A. Again, if we talk about photo ID. So for
23 example, when we discuss absentee voting, because
24 we found in that statewide survey voters told us
25 resoundingly that they wanted to know about the

1 mechanics of absentee voting. And so when we talk
2 about the photo ID requirement for that, we do
3 include that phrase.

4 Q. And by "that phrase," you mean?

5 A. It probably takes various forms, but
6 along the lines of, you know, if you're having --
7 if you need a photo ID and you're having a
8 difficult time getting one, that I -- that DMV can
9 assist for free.

10 Q. Okay.

11 A. Or if you don't have the foundational
12 documents to get an ID, that DMV has a process that
13 we try to include references to that where -- where
14 relevant.

15 Q. And what else is KW2 doing for you this
16 year?

17 A. Well, we have a list of things. We
18 actually yesterday just presented to our commission
19 our -- how we're prepared for November 3, 2020
20 election report. Part of that included our list of
21 deliverables. So they're going to be working on
22 short educational videos, social media, graphics,
23 web banners, earned media tools. We have some
24 articles and different things we're doing for the
25 earned media, fact sheets, tech graphics for

1 our -- both of our websites.
 2 And then some of the materials for our
 3 clerk tool kits for voter outreach as well, 'cause
 4 again, our survey showed that people trust their
 5 local election officials more than they do the
 6 states. And so we're focusing a lot on getting
 7 resources to those local election officials.
 8 Q. And just give me one second, 'cause I'm
 9 pretty sure -- I think I'm going to want to pull up
 10 another document I just want to get. Okay.
 11 MS. ROTKER: Alexandra, doc one, please.
 12 And we'll mark that as Exhibit 5001. And if we can
 13 just go to Exhibit 5001. Yep. Thank you.
 14 Is this the document -- oh, no, can
 15 we -- Alexandra, did we just load page 69, or do we
 16 have the full document? 'Cause I'd like to go to
 17 the first page. Can we go to page 1 of that,
 18 please?
 19 MS. HILL: Yep.
 20 MS. ROTKER: There we go. Great. Thank
 21 you.
 22 BY MS. ROTKER:
 23 Q. Ms. Wolfe, is this the document you were
 24 talking about?
 25 A. Yes, it is.

1 of Exhibit 5001.
 2 A. Yes.
 3 Q. This is your outreach program.
 4 A. Some of it.
 5 Q. Okay.
 6 A. This is -- this report, though, please
 7 remember, is also very specific to what we're doing
 8 to prepare for the November election at a very high
 9 level. And even at a high level it's 130 pages.
 10 So it's just some -- some, you know, very, very
 11 high level things. Obviously it doesn't go into
 12 the granular detail about the, you know, texts or
 13 the phrasing or the scripts that were used for
 14 every deliverable.
 15 Q. And I understand that. If you go to
 16 page 65 of the document, which is page 69 of the
 17 PDF at the bottom of the page, public education
 18 program details. Let me know when you can see
 19 that.
 20 A. I can see it.
 21 Q. Okay. At the bottom of the page the last
 22 sentence says, "Our primary focus has been on
 23 information that local election officials can use
 24 to communicate with voters and local news media
 25 about election security"; correct?

1 Q. And what page were you reading from when
 2 you were talking about what KW2 was hired to do?
 3 A. Well, if you look at the table of
 4 contents -- it's a large document. Page 63 is
 5 where it begins. 63 of the document, not of the
 6 PDF.
 7 Q. Yeah, that's always a fun distinction.
 8 Okay. Are any of those materials specific to ID
 9 and IDPP that you're asking KW2 to work on this
 10 year?
 11 A. No. Again, now photo ID has been part of
 12 the process for nine years on and off. And so it's
 13 ingrained in all of our other materials.
 14 Q. How long has IDPP been part of the
 15 process? Not nine years; correct?
 16 A. Not nine years, correct. I don't know
 17 specifically. You probably know the answer to
 18 that.
 19 Q. And do you recall in 2016 Judge Peterson
 20 saying that there had not been adequate public
 21 information about IDPP?
 22 A. I don't remember that specifically, no.
 23 Q. Okay. We'll get to that in a minute too.
 24 So we're looking at page, you said page 60 -- oh,
 25 63 of the document. Or I guess it would be page 65

1 A. That's correct.
 2 Q. So that has been the primary focus of
 3 what you're working with KW2 on?
 4 A. Yes. But I think if you -- you know, we
 5 have -- we love our memos at the WEC. So we've got
 6 a lot of other materials out there about the survey
 7 and about some of our other outreach approaches.
 8 What voters define as election security is very,
 9 very broad and different than maybe what we thought
 10 the definition was, which was cyber security or
 11 things to do with technology.
 12 We actually find that voters'
 13 definition of that is very different. It's about
 14 the mechanics of how voting works. And so I think
 15 when we say it's focusing on election security,
 16 that's true, but election security and how voters
 17 define it, which is the mechanics of how voting
 18 works. And a lot of their questions revolved
 19 around absentee, which of course has a photo ID
 20 component.
 21 Q. Well, if you go to the following page,
 22 which is page 70 of the PDF, it really does -- I
 23 mean, the materials that you were working with KW2
 24 to produce -- or KW2 is working with you to
 25 produce, all really focus on the absentee process;

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1 correct?

2 A. The absentee process, but also the

3 commission made it very clear in their draft to us

4 in this campaign that it has to make clear to

5 voters that they have three statutory ways to be

6 able to cast their ballots, and all three options

7 are safe and secure.

8 So while it focuses on the mechanics

9 of absentee, because that's new to a lot of voters

10 this year, it also has those other elements to make

11 sure that voters are aware of their options and

12 aware of some of the peripheral requirements, such

13 as registration and photo ID.

14 Q. And I understand that. But we're getting

15 at the focus versus peripheral options. So you

16 just called photo ID peripheral, and earlier in

17 this deposition you said IDPP doesn't even affect

18 that many people. So would you say that's an even

19 more peripheral part of this?

20 MR. MURPHY: Object to form.

21 THE WITNESS: I don't think --

22 MR. MURPHY: You may answer.

23 THE WITNESS: I don't think that was an

24 accurate -- no.

25 BY MS. ROTKER:

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1 Q. How -- how much of these materials would

2 any voter who looks at these videos know

3 about -- the new videos you're asking to be

4 produced, know about IDPP specifically?

5 MR. MURPHY: Object to form. You may

6 answer to the extent you're able.

7 THE WITNESS: I believe that I've already

8 covered that.

9 BY MS. ROTKER:

10 Q. So the new videos that are being produced

11 in the deliverables, are you saying that all of

12 those documents are going to talk about IDPP?

13 A. No.

14 Q. Okay. Do you know what percentage of

15 those documents?

16 A. No.

17 Q. Which of those items?

18 A. No, I do not.

19 Q. Okay. What is the budget for KW2 for

20 this year?

21 A. Again, I don't have that in front of me,

22 but that's publicly available as well. The

23 commission considered and directed the expenditures

24 for our -- our campaign.

25 Q. Do you know off the top of your head if

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1 it's more or less than about \$250,000?

2 A. It's more.

3 Q. It's more. Okay. And where would that

4 information be available?

5 A. On our website.

6 Q. Is there somewhere that's available more

7 specific details about KW2's contract and the

8 materials that they are going to produce in more

9 detail than what's in Exhibit 5001?

10 A. Yes. It would all be in our commission

11 materials. We've had almost 30 commission meetings

12 this year where they consider and approve various

13 directives.

14 Q. And that -- does that include the actual

15 full contract with KW2?

16 A. I believe it does, yes.

17 MS. ROTKER: Okay. Now actually, before

18 I go on to a new topic, let me just ask quickly

19 whether anyone wants to take a five-minute break or

20 whether we want to keep going. 'Cause it's been

21 about 50 minutes. But this seems like a good

22 pause.

23 THE WITNESS: I would take a brief break.

24 MS. ROTKER: You would like to take a

25 brief break?

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1 THE WITNESS: If that's okay.

2 MS. ROTKER: Absolutely. Why don't we

3 take five. Everyone can mute themselves if you

4 wish and stop their video. And we'll come back on

5 in. And we are off the record, please.

6 THE VIDEOGRAPHER: Time is 9:50 a.m., and

7 we are off the record.

8 (Break taken.)

9 THE VIDEOGRAPHER: Time is 9:55 a.m., and

10 we're back on the record.

11 MS. ROTKER: That was good. That was

12 actually five minutes. So let's -- Alexandra, can

13 you get doc four? And we'll mark that as

14 Exhibit 5002.

15 Is it up?

16 BY MS. ROTKER:

17 Q. Okay, let's go to Exhibit 5002, please.

18 Do you have it up, Ms. Wolfe?

19 A. Yes, I do.

20 Q. Okay. Is this the document that is being

21 mailed to all voters this week, perhaps?

22 A. Yesterday, yes. It hit the mail to about

23 2.6 million voters.

24 Q. And this document is considered to be a

25 key part of the outreach to voters, correct, this

Pages 41 to 44

1 mailing?

2 A. Yes. It's direct contact to each of the

3 voters that don't currently have an absentee

4 request on file.

5 Q. Okay. Where in this document does it

6 mention IDPP or that you can get an ID without a

7 birth certificate?

8 A. It does -- it mentions photo ID

9 requirements. But as you can see, you know, we did

10 extensive usability testing on this and found that

11 sometimes you reference the concept and then

12 provide a place where people can call for more

13 information or to ask questions. So we do talk

14 about photo ID, and also the indefinitely confined

15 exemption.

16 Q. But it doesn't specifically say, for

17 example, even if you don't have a birth certificate

18 you can get an ID for free?

19 A. We're on page 1, and I think photo ID is

20 on page 2. But no, I don't believe it says that.

21 Q. You can feel free to go to page 2.

22 A. Oh, I'm sorry, I keep forgetting this is

23 not -- it's something I can draft.

24 Q. No, that's fine. We're all learning.

25 A. On the second page it says you need a

1 very bottom on page one; is that correct?

2 A. Need assistance, we're here to help.

3 Q. Okay. Are you aware that many voters

4 don't have digital access?

5 A. Yes. And that's very much why this

6 letter is being sent.

7 Q. Because you're aware that voters don't

8 have digital access?

9 A. There may be voters, unfortunately,

10 or -- yes, that don't have access.

11 Q. Does your help desk -- I forgot to ask

12 you this -- does it work nights and weekends?

13 A. It will -- it will be, yes. It will be.

14 In this stretch of the election we works nights and

15 weekends. We also contract, again, with the call

16 center. So yes.

17 Q. When does that start?

18 A. Well, we're still trying to sort of

19 finalize what our hours will be even this weekend

20 over the holiday weekend. But we -- there will be

21 some finalization to those plans coming.

22 Q. But, I mean, are you talking about a week

23 before the election, a month before the election?

24 Like how long a period are you looking at?

25 A. Probably pretty consistently for the next

1 photo ID to vote, and then it has some text about

2 the photo ID requirements.

3 Q. Okay. And it refers people to a website,

4 correct, the Bring --

5 A. It does. And it does say to learn how to

6 get a photo ID for free, if you don't have one,

7 that you can go there.

8 Q. I understand that. Let me just clarify.

9 This mailing in Exhibit 5002, that's actually going

10 to two million or so voters on paper, like hard

11 paper copies; correct?

12 A. Correct. 2.6 million voters. It hit the

13 mail yesterday.

14 Q. But it's referring people to a digital

15 resource; correct?

16 A. No. As I've talked about we have -- it

17 does say you can go to Bring It, but you can also

18 call our help desk. And we're going to be

19 assisting people starting with this, you know,

20 weekend when it starts to hit the mail with any

21 questions they have about anything on the mailer.

22 Q. Okay. Does the -- okay. It says to find

23 your -- on page 1 to find your polling place, you

24 can call -- there's a phone number to call. Does

25 it -- oh, okay, I see. The help desk is at the

1 two months.

2 Q. Okay. And the lack of digital access is

3 an even bigger problem right now during the

4 pandemic, because a lot of public spaces like

5 libraries, where people can get digital access, may

6 be closed; right?

7 MR. MURPHY: Object to form. You may

8 answer.

9 THE WITNESS: I think that's outside of

10 my area of expertise.

11 MS. ROTKER: Okay. Let's go to the Bring

12 It To main website. Alexandra, I think that's -- I

13 think we PDFed it as doc seven. Yeah. Okay.

14 Let's mark that as 5000 -- Exhibit 5003.

15 BY MS. ROTKER:

16 Q. Do you see that?

17 A. Yes, I do.

18 Q. Okay. So it does explain -- now

19 this -- you can get a Wisconsin state ID card for

20 free. That's not on the home page; correct? You

21 have to click through and page down; is that right?

22 A. You might have to put this in a little

23 bit of context for me. I think this is the Bring

24 It to the Ballot website, the BringIt.wi.gov

25 website. That page, I think there is certainly a

1 display about you can get an ID for free on the
 2 home page. But this information is on that sub
 3 page from the home page.
 4 Q. It's on the sub page. Okay. So you
 5 would have to do an additional click, basically, to
 6 get to this page, is that correct, to your
 7 knowledge?
 8 A. Well, contents like this would never
 9 appear on a home page. That would be goofy. So
 10 yes, you have a task, and then somebody clicks on
 11 that and goes to more information.
 12 MS. ROTKER: So Alexandra, doc 19,
 13 please.
 14 BY MS. ROTKER:
 15 Q. Are you familiar with the level of
 16 success that the digital campaign on how to get an
 17 ID had -- after in 2016?
 18 A. We may have at some point submitted
 19 documentation on that. I don't know.
 20 Q. Okay. Let's go to Exhibit 5004. Which
 21 we've just marked. This is an e-mail chain. You
 22 are copied on this e-mail chain; is that correct?
 23 A. Ooh, that's a blast from the past. Yes,
 24 I am.
 25 Q. And so you received this e-mail?

1 A. It appears so.
 2 Q. Okay. Let's go down to page 4 -- or
 3 let's go down to page 3 of the document. This is
 4 KW2's campaign report, correct, from the Bring It
 5 campaign in 2016. Their final campaign report.
 6 A. I'm still looking at the e-mail. So I
 7 don't see a final report.
 8 Q. Oh. Page 3 of the document.
 9 A. Thank you. The new document.
 10 Q. Sorry, I thought I said that. I might
 11 have missed it.
 12 A. That appears to be the title of it. It
 13 says KW2 final campaign report.
 14 Q. Let's go to page 4 of the document. And
 15 do you see that it says there were only 61 sessions
 16 on how do I get a free ID card, free state ID card,
 17 about a third of the way down, under visiting
 18 after. Do I have the right photo ID?
 19 A. Yes, that's what it says.
 20 Q. So it appears that this digital campaign
 21 may have only been useful to about 61 voters on
 22 that issue; is that correct?
 23 MR. MURPHY: Object to form. You may
 24 answer.
 25 THE WITNESS: I don't know.

1 BY MS. ROTKER:
 2 Q. Do you consider KW2 to be -- sort of have
 3 the expertise in measuring these kinds of metrics
 4 and that kind of information?
 5 A. Yes, I believe so. But I don't know that
 6 sessions indicates total reach. So I think this is
 7 one isolated document.
 8 Q. Okay. But if KW2, for example, were to
 9 say that they didn't reach a lot of people, they
 10 would have expertise on evaluating the level of
 11 success; is that correct?
 12 A. I believe they would, yes.
 13 Q. Okay. Thank you. Do you have any
 14 metrics for 2020 on the reach of the Bring It
 15 website?
 16 A. I'm sure we would have analytics from the
 17 page. But no, I do not have those.
 18 Q. And so has anyone analyzed the reach? Or
 19 how that is working in 2020?
 20 MR. MURPHY: Object to form. You may
 21 answer.
 22 THE WITNESS: As with any of our sites,
 23 the data and the analytics is available.
 24 BY MS. ROTKER:
 25 Q. But what I'm asking is, is anyone looking

1 at this in real time and saying wow, there are only
 2 50 people looking at the how do I get an ID page,
 3 do we need to reach more people, or something like
 4 that?
 5 MR. MURPHY: Object to form.
 6 THE WITNESS: No.
 7 BY MS. ROTKER:
 8 Q. Okay. And let's just also, while we have
 9 this document up, go to page 8 of the document.
 10 And you see that this is sort of a heat map of
 11 digital performance across the state?
 12 A. It appears to be, again from 2016, yes.
 13 Q. And so there are significant number of
 14 parts of the state where there was low reach;
 15 correct?
 16 A. I can't really quantify the percentage in
 17 terms of population. I don't know. I don't have
 18 enough information.
 19 Q. Okay. But again, KW2 would have the
 20 expertise to analyze this; correct?
 21 A. I believe so, yes.
 22 Q. Okay. Great. Now, you talked about some
 23 of the documents. Let's go to --
 24 MS. ROTKER: Alexandra, let's do doc ten
 25 and mark that as Exhibit 5005, please. Okay.

1 BY MS. ROTKER:
 2 Q. If you can please pull up Exhibit 5005.
 3 This is the photo of acceptable photo IDs for
 4 voting in Wisconsin; correct?
 5 A. Over the years we've had many versions,
 6 so I don't know if this is the most recent one.
 7 But yes, we have -- this is among many other
 8 documents that we have about photo ID.
 9 Q. Okay. It does not on here say anywhere
 10 anything about what to do if you don't have an ID;
 11 correct?
 12 A. Well, this particular handout doesn't,
 13 but there's others that do. This is pictures of
 14 photo IDs.
 15 Q. I understand that. Doc five, please.
 16 A. And it does say ID petition process under
 17 the receipts. It says valid for 45 days from the
 18 date of issue, or 180 days for the ID petition
 19 process.
 20 Q. Let's talk about two things there. Is
 21 that still valid? Is that actually the law now,
 22 the 180 days? Is that how long the receipts are
 23 being issued?
 24 A. You know, I don't know.
 25 Q. And it doesn't explain what the ID

1 petition process is; correct?
 2 A. Doesn't explain what a student ID or a
 3 passport or tribal ID is either. It's just
 4 pictures.
 5 Q. Okay.
 6 MS. ROTKER: Doc five, Alexandra. Is
 7 that up now? Thanks. All right.
 8 BY MS. ROTKER:
 9 Q. Let's go to what we're marking as
 10 Exhibit 5006. I will represent to you that we
 11 downloaded this from the WEC website this week. If
 12 you would prefer that we actually pull up the
 13 actual website so you can verify that, we can do
 14 that. Your choice.
 15 A. No, this is fine. I think I'm familiar
 16 with this.
 17 Q. Okay. Do any of these documents talk
 18 about IDPP?
 19 A. Yes.
 20 Q. Let me -- let me rephrase the question.
 21 Do any of them on your face, if you're looking at
 22 the list, say you can get ID if you don't have a
 23 birth certificate or -- I understand that there are
 24 documents about how to get ID.
 25 A. Well, these are links to documents, so

1 they're not descriptions. And in what you just
 2 described is a very long description. But for
 3 example, there's one that says Wisconsin DMV ID
 4 petition process photo receipt as ID for voting.
 5 Q. But again, someone would have to
 6 understand what that is before -- understand what
 7 the whole process is; right? There's no evident
 8 explanation, again, that says something like how to
 9 get ID if you don't have a birth certificate.
 10 A. These are all links to more information
 11 with a title.
 12 Q. And these are resources, again, that are
 13 provided digitally; correct?
 14 A. Yes. I mean, they're meant to be printed
 15 as well if someone would like to do that.
 16 Q. Okay. Let's go to doc six, which we'll
 17 mark as Exhibit 5007. And if you could go to that,
 18 please.
 19 Again I will represent that we
 20 downloaded this. We can again get you the URL --
 21 it's a three-page document -- if you prefer. But
 22 it was just downloaded this week. Is that
 23 acceptable to you?
 24 A. That's fine.
 25 Q. Okay. And this is -- again, if you look

1 at the -- these are the frequently asked questions
 2 on the WEC's website; correct?
 3 A. This is the -- the elections.wi.gov
 4 website, yes. We have other websites as well that
 5 are more voter facing, yes.
 6 Q. But if someone went to this website --
 7 could you go to page 3, please? It doesn't say
 8 anything about IDPP, does it, under voter photo ID
 9 law?
 10 A. So I'm looking at this. It doesn't
 11 appear in this particular place, but -- I mean, I
 12 know it is -- does appear throughout this website.
 13 Q. Right. But for example, if a voter went
 14 to the frequently asked questions page, they would
 15 not find an answer on what to do if they don't have
 16 ID, and certainly not on IDPP there?
 17 A. I don't know if that's true. I think
 18 that there are other areas where that information
 19 appears. So I don't know that that's accurate to
 20 say of the whole website.
 21 Q. Okay. By "website," I mean this
 22 document, under the FAQs. Is there somewhere in
 23 the FAQs that I'm missing where it talks about
 24 IDPP?
 25 A. In this particular what I'm looking at,

1 no, we do not talk about IDPP.
 2 Q. Okay. Doc 11. And we'll mark that as
 3 Exhibit 5008. And if you could go to Exhibit 5008,
 4 please. And does this document talk about IDPP?
 5 A. I don't know what I'm looking at.
 6 Q. Okay. Does this -- the document marked
 7 as 5008 is a document entitled Wisconsin Voting
 8 Deadlines and Facts for November 2020. It's on
 9 Wisconsin Elections Commission's letterhead. It
 10 was on your website. Does it look familiar to you?
 11 A. You know, I'm trying to figure out if
 12 this is a memo, if this is a web page. I mean, our
 13 website has a lot of content. So I'm not sure what
 14 the context is for this.
 15 Q. So you don't know -- you're saying you
 16 don't know what this document was used for?
 17 A. Yes. I'm sorry, I can't -- I can't
 18 determine the context for this from what I'm
 19 looking at.
 20 Q. Okay. So --
 21 A. Is it a news release or is it a -- I'm
 22 not sure.
 23 Q. Well, for example, it says, about halfway
 24 down the first page, "Here are some key dates and
 25 facts to remember for the upcoming presidential

1 election on November 3, 2020, whether you're voting
 2 by absentee ballot or in person." Does that
 3 suggest to you that it's for voters?
 4 A. Yes, it certainly does. I think this is
 5 a news release, though. But yes, that's helpful.
 6 Q. And nowhere in here does it mention IDPP,
 7 correct, or getting an ID if you don't have a birth
 8 certificate?
 9 A. It's not up anymore, so I can't verify
 10 that.
 11 Q. The document's not up. Oh, I'm sorry, I
 12 was flipping pages. It's a three-page document.
 13 A. Yeah. Without having to read the whole
 14 thing, I'm not sure. I think we make reference to
 15 photo ID requirements and where to go to get more
 16 information.
 17 Q. Do you have any reason to doubt that this
 18 is a genuine document that was issued by the
 19 Wisconsin Elections Commission?
 20 A. No, I'm not doubting that, I just don't
 21 think it's been put into context very well.
 22 Q. Okay. Let's get doc twelve up, please.
 23 And mark that as Exhibit 5009. Is this a document
 24 that was issued by the Wisconsin Election
 25 Commission?

1 A. It looks like the type about notice,
 2 which is a notice for the clerks to post as a
 3 template notice.
 4 Q. What does that mean that you give it to
 5 the clerks and that's what they are supposed to
 6 use?
 7 A. So the law prescribes some of the notices
 8 that the clerks have to use to notice elections or
 9 various components of the election, and this would
 10 be one of those template notices, and then they
 11 customize it for their jurisdiction.
 12 Q. Okay. In the middle of the page in the
 13 first paragraph under Information to Voters on
 14 page 1, do you see that?
 15 A. Yes, I do.
 16 Q. Again, it says a voter may obtain a free
 17 photo ID for voting from the Division of Motor
 18 Vehicles; correct?
 19 A. Yes.
 20 Q. But again, it doesn't say anything about
 21 IDPP or voters who, you know, don't have birth
 22 certificates or documents can get this ID, does it?
 23 A. No, it does not.
 24 Q. Okay. Thank you. Let's go to doc 13,
 25 which will be marked as Exhibit 5010.

1 Do you recognize this document marked
 2 as 5010?
 3 A. It looks to be another press release that
 4 was issued in February. One of many press
 5 releases.
 6 Q. Understand that. On page 1 in the middle
 7 of the page where it says photo ID required, it
 8 quotes you as saying you still have time to get a
 9 free one at DMV, but you should not delay; correct?
 10 A. Yes.
 11 Q. Again, it does not say anything about
 12 IDPP or the ability to get ID even if you don't
 13 have a birth certificate; right?
 14 A. It does not, no. It references the
 15 concept more generally.
 16 Q. Okay. Thank you. I have -- and earlier
 17 this year, WEC sent out postcards to voter -- to
 18 people who were listed in the DMV system but not
 19 registered, were not listed as registered,
 20 encouraging them to register; correct?
 21 A. As part of the ERIC agreement. So
 22 Wisconsin, by state statute, has to be members of
 23 the ERIC consortium of states. And as part of that
 24 process we have to abide by the ERIC agreement.
 25 And that means yes, we have to send information or

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1 make contact with voters who are eligible to
2 register but are not registered.
3 Q. Great. Is there a reason that you have
4 not sent postcards -- done it essentially in
5 reverse, so sent postcards to people who are listed
6 in your voter regis -- let me scratch that. Let's
7 go back a second.

8 When people register now, they
9 generally, if they have a driver's license or state
10 ID card, they get that number, correct, on their
11 registration form?

12 A. If they have one or have been issued one,
13 then they're supposed to provide it, yes.

14 Q. Okay. Is there a reason that WEC doesn't
15 then do this in reverse? In other words, look at
16 the voter registration system and send notice to
17 those who are not listed as having a Wisconsin
18 driver's license or state ID of the ID requirement
19 and IDPP?

20 A. That's not part of the -- the statute
21 doesn't require that, doesn't outline that. It's
22 not part of the ERIC process. Nor is it data we
23 would have access to.

24 Q. You have access in your voter
25 registration system to who does or does not have

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1 driver's license or ID card listed, don't you?

2 A. We have whatever information the clerk
3 has provided to us from those registration forms.
4 There are certainly registrations that do not have
5 IDs associated with them, either because the voter
6 registered before they -- or started voting before
7 there was a registration requirement, which was
8 surprisingly recent.

9 So there are some records with
10 driver's license numbers or photo ID numbers, and
11 then there are some records without. But I don't
12 think that that is indicative of whether or not
13 they have a product.

14 Q. Okay. Just because you said voter
15 registration was surprisingly recent. That started
16 in about 2006; right?

17 A. Correct.

18 Q. Okay. Other than because it's not
19 required by ERIC, is there a reason why WEC hasn't
20 sent postcards saying you may already have a
21 Wisconsin driver's license, ID card or the right
22 ID, but if you don't, here's how to get one and
23 here's how to get one if you don't have a birth
24 certificate or something like that to people in
25 your registration system where there is no

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1 indication that they have a Wisconsin license or ID
2 card?

3 A. Again, that's not currently part of any
4 sort of initiative or statutory responsibility that
5 the commission has considered.

6 Q. And I'm asking -- well, let me ask. Why
7 not?

8 A. Again, that isn't part of a statutory
9 responsibility or initiative that the commission
10 has considered.

11 Q. Would it inform voters of ID and IDPP by
12 mail?

13 A. I don't know. We haven't done any
14 analysis on that.

15 Q. Thank you. Do you happen to know, by the
16 way, what percentage of registrations now come in
17 with driver's license ID card information?

18 A. No, I do not.

19 Q. Let me just ask you a question. We've
20 talked about another -- a number of online
21 resources. Do you have resources that are
22 available off line that are not online about ID and
23 IDPP?

24 A. I guess, what would it be, six million
25 pieces of paper that went in the mail yesterday

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1 that talk about photo ID. But no, we found -- like
2 I mentioned previously, even in pre-Covid times the
3 groups that we produced printed materials for had
4 no interest in it. And we actually have those
5 boxes still to this day in our office.

6 Q. Okay. Let's -- let's just put up doc
7 nine right now, please. And that'll be
8 Exhibit 5011.

9 And if you can go to that document,
10 please. Do you recognize this document?

11 A. Yes.

12 Q. And what is it?

13 A. It looks like the cover page to some of
14 our photo ID informational guides.

15 Q. And this is actually a 37-page document.
16 Do you see that?

17 A. Correct.

18 Q. So is this the full guide?

19 A. This is the full guide in terms of I
20 created this back, I don't know, when I was doing
21 voter outreach. And this is the packet I would
22 bring with me to presentations, or we would provide
23 to voter groups, or that we would use as our
24 outline of sort of talking points.

25 Q. And is it still used?

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1 A. It looks like, yes, the team updated it
2 in 2020.

3 Q. Okay. Let's go to page 2 of the
4 document, under table of contents. Does it say
5 anything about -- I understand it says ID petition
6 process receipt, but does it say anything about how
7 to get an ID if you don't have -- what documents,
8 actually, does it -- is it clear from the table of
9 contents that there's a page about how to get an
10 ID?

11 MR. MURPHY: Object to form.

12 THE WITNESS: There's an ID petition
13 process receipt.

14 BY MS. ROTKER:

15 Q. Just the receipt, though?

16 A. It lists that, along with all the other,
17 again, titles. These are titles of different
18 documents that are in the packet.

19 Q. Right. I'm just looking from the
20 perspective of someone who might open it up and not
21 know what they're looking for. And in fact
22 until -- I don't see anywhere in this document,
23 until the bottom of page 12, where it says what if
24 I don't have the documents needed to get a
25 Wisconsin state ID card. Are you aware of anywhere

1 else that might be?

2 A. I would -- I would have to go read back
3 through the whole thing. I'm not sure. Each one
4 is a different type of photo ID. So those
5 references are made on documents that are relevant
6 to DMV product. It wouldn't make sense for that to
7 appear on a document about student ID or veteran's
8 ID, because we're talking about DMV products. So
9 it's in a relevant spot.

10 Q. But it could be in a table of contents,
11 couldn't it?

12 A. I think an explanation of something would
13 be quite strange in a table of contents.

14 Q. Do you know whether or what percentage of
15 voters would actually read through this big of a
16 document to find that little paragraph of
17 information?

18 A. I believe that's -- that little
19 paragraph, as you put it, is in multiple places
20 where relevant.

21 Q. In this document?

22 A. So I actually -- based on my experience,
23 you know, people would go to the document that was
24 relevant to them and they would look -- it's
25 indexed quite well in terms of the different

1 highlights, talking points throughout those types
2 of ID. And if people are looking for relevant
3 information, I think it's quite accessible.

4 Q. So this is a true and accurate copy of
5 information you actually use, correct, that --

6 A. Yes.

7 Q. -- that WEC uses. Okay. Let's -- I
8 would like to go now, actually, to the Bring It
9 website.

10 MS. ROTKER: Alexandra, you had figured
11 out how to do that, the multi-media page. We're
12 doing this actually through a browser, but I'm not
13 going to pretend I understand the process,
14 so -- okay.

15 BY MS. ROTKER:

16 Q. So Ms. Wolfe, can you see the screen that
17 is put up and also can the court reporter see it?

18 A. Oh, it's back on Zoom. Yes, I can.

19 Q. Yes, this is put up on Zoom. And this is
20 the Bring It multimedia website; correct?

21 A. Yes.

22 Q. Okay. Can we click on radio ads, please?

23 Can you -- oh, that's -- I think that was an
24 accidental click before a not found page. Let's
25 just go to radio ads here. Can you tell

1 me -- there are multiple radio ads listed. And we
2 can go through all the titles of them, but can you
3 tell me which one of them actually tells people
4 about IDPP, about getting an ID if you don't have
5 the documents you need?

6 A. I don't remember. I don't remember.
7 We'd have to listen to them all.

8 Q. But these are -- this is a full and
9 accurate list? I mean, what's on your website is
10 what you have; correct?

11 A. I believe so. I haven't myself gone
12 through and, you know, double-checked the index
13 anytime recently.

14 Q. Okay. So if one listened to these radio
15 ads and they didn't talk about IDPP or getting an
16 ID without documents, I mean, that would be the ad
17 to have up; correct?

18 A. These are the -- these are the ads, yes.

19 Q. Okay. And is that also true -- let's
20 scroll down. Is that also true about the TV ads?

21 A. Yes. I would call them more or less
22 digital ads. But yes. But yes, it's titled that,
23 so I --

24 Q. When they're called TV ads -- well, let
25 me ask you a question about that. I mean, was this

1 actually run on TV? On television?

2 A. It was for a brief time when that funding

3 was available for the media buys. But yes, it was

4 briefly. But mostly they've been used digitally,

5 or community access channels that may want to use

6 them, things like that.

7 Q. Are there any media buys for either radio

8 or TV ads in year 2020?

9 A. That budget has long been expended, and

10 we did not receive any additional appropriations.

11 Q. So that means there is no money for radio

12 or TV ads this year; correct?

13 A. That's correct.

14 Q. Is there money for digital ads?

15 A. I believe -- I'm not sure. I'm not sure

16 what's -- what the contract exactly looks like or

17 what we allocated for digital ads. I believe there

18 is.

19 Q. And where would that information be?

20 A. Again, it's part of our commission

21 packets.

22 Q. What do you mean by "commission packets"?

23 A. The materials for our commission.

24 Q. And by that you mean the materials that

25 are listed on the website as being the open session

1 materials when the WEC meets; correct?

2 A. Correct.

3 Q. Okay. Let's just scroll down to -- one

4 more, to the animated video, please. And again,

5 the -- you're saying the animated videos are the

6 current and accurate information?

7 A. Yes.

8 Q. Do you know which, if any of these

9 videos, mention IDPP?

10 A. I believe all of them do. And there's

11 even a specific one that talks just about IDPP.

12 Q. And which one would that be?

13 A. I'm sorry, I don't know. I don't

14 have -- we're kind of looking through the

15 scrolling. I don't know the names or the scripts.

16 I don't know.

17 Q. Well, let's just for the record state

18 what the names of those videos are so that we can

19 go back and look. So one says How to Get a Free

20 Wisconsin State ID For Voting Purposes video;

21 right?

22 A. That's the one, yep.

23 Q. Okay. Voter Photo ID and New Polling

24 Place Procedures in Wisconsin.

25 A. Again, I don't know. I remember vaguely

1 working on them to update everything to have

2 references about going -- you know, how you can get

3 an ID if you don't have documents or for free, but

4 I don't know exactly what the scripts look like for

5 each one.

6 Q. Okay. Absentee voting. I just want to

7 make sure we've captured all the videos that are up

8 there. And we can go back to those afterwards or

9 outside of this. Absentee Voting and Exceptions

10 For Permanent Absentee Voters video, that's up

11 there; correct?

12 A. Uh-huh. Yes.

13 Q. And What to Expect At the Polling Place

14 in Wisconsin video; correct?

15 A. Yes.

16 Q. Would it surprise you to know that in the

17 How to Get a Free Wisconsin State ID For Voting

18 Purposes video it doesn't even talk about IDPP

19 until about a minute 20 in?

20 MR. MURPHY: Object to form. You may

21 answer.

22 THE WITNESS: I don't know.

23 BY MS. ROTKER:

24 Q. Do you know how many voters would be

25 likely to stay on the video for that long?

1 A. I don't know.

2 Q. Do you know how long metrics show voters

3 are likely to stay on a website?

4 A. I don't know.

5 Q. Okay. And again, KW2 has some expertise

6 in this; correct?

7 A. Correct.

8 Q. Okay. I'm sorry, I think -- oh, let

9 me -- actually, let me just ask another question

10 about the video. Other than on your -- on the

11 Bring It web page, where are those videos running?

12 Are you placing them -- is WEC or KW2 placing them

13 in other formats or other locations, or is it that

14 someone needs to know to come to your website and

15 then find a video?

16 MR. MURPHY: Object to form. You may

17 answer.

18 THE WITNESS: We've also used them in

19 social media, in our social media plan for the

20 clerks. You know, obviously they're available for

21 other groups to use. So clerks may have them

22 embedded on their local website, voter groups might

23 use them to help describe the process.

24 MS. ROTKER: Okay. We can go off the

25 website now, Alexandra. Thank you.

1 BY MS. ROTKER:
 2 Q. So -- but you don't require clerks to use
 3 them, do you?
 4 A. No, clerks aren't required to.
 5 Q. Okay. Do you know anything about an
 6 effective campaign and the concept of touches,
 7 reaching voters multiple times? Is that something
 8 you're familiar with?
 9 A. I would not say that's in my area of
 10 expertise, no.
 11 Q. But again, that would be likely in KW2's
 12 area of expertise; correct?
 13 A. Correct.
 14 Q. And within KW2 do you work -- have you
 15 personally worked directly with Mr. Willman?
 16 A. Not extensively. But yes, I certainly
 17 have worked with him.
 18 Q. He's one of the principals of the firm;
 19 correct?
 20 A. Correct.
 21 Q. So he personally is also someone with
 22 expertise; correct?
 23 MR. MURPHY: Object to form. You may
 24 answer.
 25 THE WITNESS: I don't -- I don't know his

1 expertise, but I would assume so.
 2 BY MS. ROTKER:
 3 Q. Okay. Let's -- oh, I think this was
 4 exhibit -- or document 22.
 5 MS. ROTKER: Yeah, why don't we pull that
 6 up please, Alexandra. And that'll be Exhibit 5012.
 7 BY MS. ROTKER:
 8 Q. So if you can go to Exhibit 5012? I'm
 9 showing you a document that we received from
 10 counsel earlier this week or last week. Does
 11 this -- do you recognize this document?
 12 A. Yes, I do.
 13 Q. And what is it?
 14 A. So this is something we produced to show
 15 where in our overall outreach plan we specifically
 16 talk about IDPP.
 17 Q. And when was this -- when was this
 18 document created?
 19 A. Well, the larger documents that they're
 20 part of were created, you know, in this year as we
 21 were preparing for November. But this particular
 22 document that summarizes IDPP was produced in the
 23 last week.
 24 Q. Okay. So this is drawing from other
 25 documents you had?

1 A. Right.
 2 Q. Who created it?
 3 A. Riley mostly worked on I think actually,
 4 you know, putting some of that together, but it was
 5 certainly a team effort.
 6 Q. Okay. Who was responsible for
 7 implementing this plan?
 8 A. The WEC. I mean I think, you know -- I
 9 don't know if I can be more specific than that,
 10 but --
 11 Q. I didn't know if it was you, KW2, some
 12 other subcontractor.
 13 A. Oh, I'm sorry, our agency. So it would
 14 be our agency and agency staff.
 15 Q. And by "agency," just cause there's an
 16 advertising agency, you mean WEC agency?
 17 A. Correct, yes. WEC.
 18 Q. I just want to be clear for the record.
 19 A. Yes.
 20 Q. Okay. So -- and you think it's important
 21 that information reach voters before clerks start
 22 sending absentee ballots out on September 17th;
 23 right?
 24 A. I think it -- you know, I don't know
 25 exactly when this is specifically relevant

1 information to voters, so I think it's important to
 2 have it ingrained in our messaging throughout the
 3 election cycle.
 4 Q. Okay.
 5 MS. ROTKER: Alexandra, I'm sorry, I lost
 6 track. Did we already put doc one up and
 7 other -- if we did, could you please go to that?
 8 And otherwise, could we please put it up? It just
 9 lists the documents, so -- I think -- no, that's --
 10 I don't think we have put it up yet, so -- if you
 11 could just go ahead and put up doc one as
 12 Exhibit 5013.
 13 MS. HILL: I have -- I think we had it up
 14 as --
 15 MS. ROTKER: Did it go as 5001? Yeah, it
 16 did go as five -- okay. Can you just quickly go
 17 back to 5001, please? And go to page 70 of the
 18 PDF, please. Let me know when you're there.
 19 MS. HILL: It should be up.
 20 BY MS. ROTKER:
 21 Q. Are you there, Ms. Wolfe?
 22 A. Yes.
 23 Q. Oh, okay. I'm sorry, I was waiting. If
 24 you go to the third paragraph from the bottom, the
 25 last sentence, do you see where it says, "The

1 September 1st mailing is a kick-off date for
 2 rolling out the various parts of the public
 3 outreach plan to local election officials in early
 4 September to best reach voters before clerks start
 5 issuing ballots on September 17th." Right, it says
 6 that?
 7 A. Yes, it does.
 8 Q. And so the WEC, you felt it was important
 9 to start reaching voters before September 17th;
 10 correct?
 11 A. Yes, with all sorts of messaging. I
 12 mean, I don't think we've ever really stopped. But
 13 yes, this week is sort of our, you know, messaging
 14 specific to November.
 15 Q. Okay. Let's go back to doc 5012, please.
 16 These are the -- the schedule dates for social
 17 media posts. The first one specifically about IDPP
 18 doesn't run until September 29th; correct?
 19 A. I would say that -- no, September 15th.
 20 Q. If you compare the ones for
 21 September 15th and September 29th, one talks
 22 generally about ID. But specifically about IDPP
 23 there's nothing going up till September 29th, is
 24 there?
 25 A. We don't say those words, but it says if

1 you're interested in getting an ID for voting --
 2 free for voting purposes on the 15th.
 3 Q. I understand that. But if voters -- if
 4 voters don't have documents or perhaps have tried
 5 before and were told they had to have a birth
 6 certificate or something like that, there's nothing
 7 that specifically discusses the IDPP that you plan
 8 to have going up as the central point until the
 9 29th of September; correct?
 10 MR. MURPHY: Object to form. You may
 11 answer.
 12 THE WITNESS: The first time we say the
 13 words IDPP in this plan are the 29th, yes.
 14 BY MS. ROTKER:
 15 Q. Okay. And then you have several social
 16 media touches about IDPP; correct?
 17 A. Yes. And this is going to be -- this is
 18 a snapshot of the things from both our agency plan
 19 and the social media plan that will be provided to
 20 local election officials.
 21 Q. Okay. And I am sorry, 'cause I think
 22 something actually printed out incorrectly here.
 23 That then presupposes voters who have digital
 24 access; correct?
 25 A. The social media plan, yes.

1 Q. Right. If voters don't have digital
 2 access, they're not going to get information that's
 3 shared on social media; correct?
 4 A. Correct.
 5 Q. Okay. And there is nothing specific on
 6 IDPP going out, other than digitally, until
 7 October 6th; correct?
 8 A. So I believe what you're referencing is
 9 the -- sorry, I'm -- is some of our other outreach,
 10 including press releases and media availability and
 11 then the clerk tool kits. But, yes, from our
 12 agency, I think that's correct. Clerks may
 13 certainly do other posts or news releases prior to
 14 then.
 15 Q. Okay. Well, we'll get back to that in a
 16 second. Let's go to page 3 of document 5012.
 17 A. Would it be too disruptive if I asked
 18 for, like, a two-minute break?
 19 MS. ROTKER: No, that's fine.
 20 THE WITNESS: Get something to drink.
 21 Thank you.
 22 THE VIDEOGRAPHER: Time is 10:44 a.m. and
 23 we're off the record.
 24 (Break taken.)
 25 THE VIDEOGRAPHER: Time is 10:46 a.m. and

1 we're back on the record.
 2 BY MS. ROTKER:
 3 Q. So again, page 3 of the outreach plan
 4 discusses issuing a press release and media
 5 availability in early October; correct?
 6 A. Yes.
 7 Q. And that is maybe less -- well,
 8 October 6th would be less than a month before the
 9 election?
 10 A. Yes, about a month.
 11 Q. Do you know whether that's enough time to
 12 get information on IDPP out to voters?
 13 A. I don't know.
 14 Q. Okay. Are you aware in 2016 Mr. Magney
 15 indicated that, especially for people that didn't
 16 have documents like birth certificates, campaigns
 17 should run for six to eight weeks before an
 18 election?
 19 A. I'm not sure what you're referencing, no.
 20 THE VIDEOGRAPHER: Karyn, sorry to
 21 interrupt. We don't have video of you. I think
 22 that would be helpful.
 23 MS. ROTKER: Oh, I'm sorry. I turned it
 24 off while we were on break. I apologize. I turned
 25 it off while we were on break and forgot to turn it

1 on. I told you all I'm not good at this stuff. So
 2 thanks for flagging that.
 3 Can you please pull up doc 17? And
 4 that will be Exhibit 5013. Okay.
 5 BY MS. ROTKER:
 6 Q. Does this look familiar to you? I'm
 7 aware that you are not specifically copied on it.
 8 A. I'm not familiar with this. And it's
 9 from 2015.
 10 Q. Is Mr. Magney someone who -- I mean as
 11 your public information officer -- who has
 12 expertise in some of these materials or some of
 13 these issues like outreach campaigns and publicity
 14 campaigns?
 15 A. Yes.
 16 Q. Okay. This is not showing what
 17 where -- oh, I thought it was going to show. I
 18 think -- all right, let's just pause on this. I
 19 might come back to this at the end. I apologize
 20 for that. The pagination I have here is different
 21 from the pagination I had in my notes.
 22 But if -- would you consider
 23 Mr. Magney someone who has expertise in public
 24 outreach campaigns?
 25 A. Maybe not public outreach campaigns.

1 ingrained in the voters themselves?
 2 A. I don't know.
 3 Q. And particularly voters who may be more
 4 marginalized and not even have documents, you don't
 5 know; correct?
 6 A. That would be outside of my area of
 7 expertise, yes.
 8 Q. Okay. So let's go back to Exhibit 5012.
 9 A lot of your campaign regarding the IDPP also
 10 depends on clerks using your tool kit; right?
 11 A. Yes, that's correct.
 12 Q. And that's document 5012, page 2. And I
 13 understand that you're sharing a lot of information
 14 with clerks, but you said earlier you don't or
 15 can't, I'm not sure which, require clerks to share
 16 or use that information themselves; right?
 17 A. Yes, there's nothing in the law that
 18 would allow us to mandate that.
 19 Q. Do you have any idea how many clerks are
 20 using or will use that information?
 21 A. Well, we have 1,850 local election
 22 officials in 72 counties, so I don't know, out of
 23 the 1,922, how many use what resource.
 24 Q. Do clerks -- do you know whether most
 25 clerks or any clerks have a budget specifically to

1 He's our public information officer, so he does
 2 something very different than KW2.
 3 Q. Okay. If he said that a campaign should
 4 run for six to eight weeks, would that be -- would
 5 you trust his expertise on that?
 6 A. I would trust this was relevant to 2015
 7 discussions, yes.
 8 Q. Okay, here we go. Okay, there it is.
 9 It's at the top -- it's on doc 5013, top of page 3,
 10 where it talks about running the PSA program for
 11 six weeks before the first three elections, and
 12 eight weeks before the November election.
 13 A. This was, yes, again in 2015, initial
 14 launching of this particular program that's now
 15 been in place for five years.
 16 Q. Right. But -- my understanding is you
 17 have, for the past -- since 2016, talked about IDPP
 18 as part of the overall ID issue, but you haven't
 19 done a lot of specific targeted work only on IDPP;
 20 is that correct?
 21 A. I think it's fair to categorize it as
 22 something that's ingrained as part of our other
 23 voter materials.
 24 Q. And I understand it's ingrained as part
 25 of the WEC materials. Do you know how well it's

1 do outreach to voters?
 2 A. I don't know.
 3 Q. Is it your understanding or do you know
 4 whether budgets are actually tighter this year
 5 because of the Covid expenses?
 6 A. I think that's a multi-pronged answer.
 7 There is also many federal grants to offset of
 8 those new costs. So I don't know what the direct
 9 impact would be on their budgets.
 10 Q. Okay. Have you heard anything
 11 about -- from clerks about either budget problems
 12 or staffing problems because of Covid?
 13 A. We've heard some. I think mainly around
 14 poll workers is probably the largest discussion.
 15 Q. Okay. Have you assessed how much
 16 outreach or information sharing clerks have done in
 17 the past on IDPP?
 18 A. I do not believe we have a measure for
 19 that, no.
 20 Q. Or how many -- and you don't have a
 21 measure for how many clerks have done this work?
 22 A. Correct.
 23 Q. Okay. Then I see on document 5012,
 24 bottom of page 2, you also talk about training with
 25 voter advocacy groups; right?

1 A. Correct.
 2 Q. And that is the training -- I think very
 3 early in the deposition you talked about having
 4 some kind of training and getting groups together
 5 and talking about these issues. Is this what you
 6 meant?
 7 A. Yes.
 8 Q. Okay. And again, that is not going to
 9 occur until October; correct?
 10 A. Correct.
 11 Q. Okay. And you don't know whether that's
 12 enough time for people to absorb the information
 13 and then go out and share it with voters, do you?
 14 A. Correct.
 15 Q. But it is not six to eight weeks before
 16 the election?
 17 A. It's about a month.
 18 Q. Okay. And again, as we discussed
 19 earlier, you don't know what budget or resources
 20 these advocacy groups have to share -- to be able
 21 to share the information?
 22 A. Correct.
 23 Q. Okay. And -- okay. Do you have any
 24 specific information about how the IDPP palm card
 25 is being used other than just being posted on the

1 Bring It website?
 2 A. Not specifically. We don't have anything
 3 we track specifically.
 4 Q. Okay. And you said earlier you have no
 5 budget at all, as I understand it, for broadcast
 6 media radio?
 7 A. That's correct.
 8 Q. Or television?
 9 A. That's correct.
 10 Q. Print ads?
 11 A. That's correct.
 12 Q. Okay. Are you doing ads inside or
 13 outside buses?
 14 A. No.
 15 Q. Any kind of a texting program?
 16 A. No.
 17 Q. Billboards?
 18 A. No.
 19 Q. Any use of celebrities to assist in, you
 20 know, letting voters know about using IDPP or ID
 21 and IDPP?
 22 A. We would welcome it, but, I mean, no.
 23 Q. Okay. And I apologize if I asked this
 24 before, but I want to clarify. In your digital
 25 campaign do you know whether there's a budget for

1 advertising or how much -- whether there's a budget
 2 for digital advertising?
 3 A. I don't know.
 4 Q. Okay.
 5 A. Specific to IDPP, I don't know.
 6 Q. You don't know specific to IDPP. Okay.
 7 Let me just -- and who would know?
 8 A. Again, it would be in our materials. But
 9 there have been a lot of them this year.
 10 Q. Okay. So let's go back to page 1 of
 11 Exhibit 5012. You're saying the WEC will continue
 12 to promote the IDPP on the agency Facebook and
 13 Twitter accounts; correct?
 14 A. Correct.
 15 Q. But voters would need to know to go -- to
 16 know to go to those accounts to find the
 17 information, correct, even if they had social
 18 media?
 19 A. Well, we also have -- you know, we create
 20 the plan to be used by local election officials,
 21 voter groups. That will be part of what we present
 22 to them as well, is that they're welcome to use any
 23 of our content. And many of them do. I mean, you
 24 know, Twitter people share our content very
 25 regularly to broadcast to their audiences as well.

1 Q. Right. But that's, again, working off of
 2 other groups volunteering to do this, not the WEC
 3 itself doing it.
 4 A. I wouldn't be able to post from their
 5 social media, but we create content for them to
 6 utilize, so it would be sharing.
 7 Q. And you don't know about paid ads, again?
 8 A. Uh-huh. Correct.
 9 Q. Okay.
 10 MS. ROTKER: Actually, I know we just
 11 took a break, but can we take five right now, and I
 12 may be close to ready to turn this over to Amanda.
 13 So we -- maybe we'll get you out before noon today.
 14 Is that okay?
 15 THE WITNESS: That sounds great.
 16 MS. ROTKER: Okay. Off the record,
 17 please.
 18 THE VIDEOGRAPHER: Time is 10:58 a.m.,
 19 and we're off the record.
 20 (Break taken.)
 21 THE VIDEOGRAPHER: Time is 11:13 a.m. and
 22 we're back on the record.
 23 BY MS. ROTKER:
 24 Q. Thanks. So I finally found at the
 25 bottom -- Exhibit 13, it's the bottom of page 2.

1 My notes said the top. That's what confused me.
 2 The last paragraph, Mr. Magney expresses concern
 3 that -- regarding getting ID for people without
 4 documents that's starting to advertise two or even
 5 three weeks before an election is --
 6 MR. MURPHY: Sorry, Counsel, just slow
 7 down. We're getting to the page.
 8 MS. ROTKER: Oh, sorry.
 9 MR. MURPHY: Meagan, let us know when
 10 you're ready.
 11 THE WITNESS: I'm on document 5013. And
 12 could you please steer me in the right direction?
 13 BY MS. ROTKER:
 14 Q. Last paragraph of page 2.
 15 A. Thank you.
 16 Q. And what I'm indicating here is that --
 17 and this is specifically about people trying to get
 18 ID who don't have the underlying documents, that
 19 two or three weeks before the election is
 20 inadequate to start doing the advertising. Do you
 21 see that?
 22 A. I see that, yes.
 23 Q. And again, is Mr. Magney someone who
 24 would have some expertise in that?
 25 A. I don't think he would know how long it

1 takes for a voter to direct the process. I mean, I
 2 also think, again, this is relevant to 2015 when
 3 this was brand new to voters.
 4 Q. Okay. And you were actually copied on
 5 that e-mail as well; correct?
 6 A. It looks like I was, yes.
 7 Q. Okay.
 8 MR. MURPHY: Folks, sorry to interject,
 9 but this is a technical issue. So I've got the
 10 witness's screen up and I'm on the page, but I do
 11 not see what's being referenced. I'm wondering if
 12 there's a --
 13 MS. ROTKER: I'm sorry. Go on, Mike.
 14 MR. MURPHY: I think it's a screen
 15 sharing issue, not a document issue, but --
 16 MS. ROTKER: Are you on Agile Law?
 17 'Cause that's what --
 18 MR. MURPHY: Yes. And everything else
 19 has worked. So I think Meagan might have just
 20 scrolled down and gotten to it. I wonder if
 21 there's a monitor size issue where I'm not seeing
 22 quite the same thing she is, so -- but Meagan did
 23 just move for me. Karyn, what word are you
 24 referencing? 'Cause I think I might be at the
 25 right spot now. Or, I'm sorry, Counsel, what word?

1 MS. ROTKER: Exhibit 5013, page 2, last
 2 paragraph. Regarding the elections for which you
 3 did budget.
 4 MR. MURPHY: I see the language you're
 5 referring to now. Thank you. I think there was
 6 just a screen sharing issue. Go ahead. Sorry for
 7 the interruption.
 8 MS. ROTKER: No, totally fine.
 9 Alexandra, please go ahead and load 23 and 24.
 10 BY MS. ROTKER:
 11 Q. And this is going to be my last few
 12 questions for you, Ms. Wolfe, so -- we're all
 13 learning the technology here.
 14 So let's go to what's been marked as
 15 Exhibit 5014. Again, if you can let me know when
 16 you're there, please.
 17 MS. ROTKER: Mike, if you want to let me
 18 know too that you've got it, that's fine.
 19 THE WITNESS: I'm there.
 20 MR. MURPHY: I do see it.
 21 BY MS. ROTKER:
 22 Q. Okay. Have you ever seen this document
 23 before, Ms. Wolfe?
 24 A. I am not familiar with this, no.
 25 Q. Okay. This was, my understanding,

1 created by the Wisconsin Department of Health
 2 Services. And it talks about internet access for
 3 and/or the lack thereof for different -- different
 4 categories of people; right?
 5 A. That's what it appears to be. But I
 6 haven't read it and I'm not familiar with this, no.
 7 Q. Okay. Do you have any reason to doubt
 8 the validity of the information in here?
 9 A. It looks like it says findings from the
 10 Wisconsin Family Health survey. It doesn't say
 11 what department it came from. So I don't know. I
 12 can't really speak to anything about this.
 13 Q. Okay. That's fine.
 14 MS. ROTKER: Alexandra, if you want to
 15 load up the other one, I think we're -- as 2015, I
 16 think that was doc 24, please. Thank you.
 17 BY MS. ROTKER:
 18 Q. Let's just go to what we're marking here
 19 as Exhibit 5015. Have you ever heard of the
 20 Wisconsin Policy Forum?
 21 A. No. I mean, it sounds vaguely familiar,
 22 but I'm not --
 23 Q. Okay. It references data, if you look at
 24 page 1, data collected by DPI, which is the
 25 Wisconsin Department of Public Instruction,

1 regarding internet access. Do you have any reason
 2 to doubt that data or question that data?
 3 A. I have no frame of reference for if
 4 they're a credible source. I don't know. I can't
 5 speak to that.
 6 MS. ROTKER: Alexandra, can you also
 7 load, I think it's 18, the one that's the map.
 8 Please.
 9 BY MS. ROTKER:
 10 Q. Are you aware or have you heard that, for
 11 example, people of color, black and Latinx people,
 12 are less likely to have internet and/or computers
 13 than others?
 14 A. I do not know.
 15 Q. Okay. And you do not have any sense of
 16 which categories of voters might be less likely to
 17 have those resources?
 18 A. It would be entirely speculation.
 19 Q. Okay. Let's just look at Exhibit 5016,
 20 which is a broadband map of unserved areas, which
 21 indicates that a lot of rural parts of the state do
 22 not appear to have internet, especially western and
 23 northern Wisconsin. Do you have any reason to
 24 doubt that information?
 25 A. Again, my apologies, but I don't know the

1 source of this information. I don't know if this
 2 is -- oh, it looks like it's from August. I have
 3 no reason to doubt it, but I don't know -- I can't
 4 vouch for it.
 5 Q. Have you ever heard from clerks or others
 6 in rural parts of the state that they either lack
 7 internet or have limited internet?
 8 A. I have heard from some rural clerks that
 9 that's an issue that they face, yes.
 10 Q. And if that's an issue they face,
 11 presumably it's also an issue their voters face?
 12 A. I can't speak to that. I don't know, you
 13 know, voter behavior, if they're using data that
 14 works on cellular networks versus clerks' secure
 15 networks. I'm not sure.
 16 MS. ROTKER: Okay. Well, thank you for
 17 your time. I'm going to turn this over to Amanda
 18 Callais. And we appreciate it.
 19 THE WITNESS: Thank you.
 20 E X A M I N A T I O N
 21 BY MS. CALLAIS:
 22 Q. Thank you, Ms. Wolfe. Hopefully I will
 23 move through this as quickly as I can. I have some
 24 follow-up questions on the exhibits that you've
 25 already looked at, and then I have just a new set

1 of questions on I think one other exhibit. And so
 2 let's go ahead and pull up exhibit -- we've marked
 3 it as 5012. Just in case you need to reference it.
 4 A. Okay.
 5 Q. So you talked -- you talked over this
 6 document a bit. And as I understood it, this
 7 document lays out four components of WEC's
 8 education plan for IDPP in 2020; is that right?
 9 A. Yes. Again, this is part of a much
 10 larger campaign. We're just highlighting where
 11 IDPP is specifically mentioned.
 12 Q. Right. So there are four components of
 13 the campaign --
 14 A. Yes.
 15 Q. -- for IDPP? And those are social media,
 16 third party groups or advocacy groups, clerks, and
 17 then earned media; is that right?
 18 A. So it looks like then you're putting
 19 together -- there's five categories in the document
 20 itself. But if you put together press releases,
 21 media availability as earned media, then I think
 22 that would be accurate.
 23 Q. And those releases, those are -- those
 24 are the types of things that will get you earned
 25 media? You put out a press release and then a

1 reporter -- or a reporter may or may not cover
 2 that?
 3 A. Correct, yeah. But we also do that as
 4 part of our clerk tool kit as well so that they can
 5 use those template press releases to -- to reach
 6 out to their local media.
 7 Q. So those press releases are things that
 8 will either go towards the clerk components of your
 9 plan or the earned media part of your plan?
 10 A. Yes.
 11 Q. Got it. And so for the third party
 12 groups, as I understood you to say earlier, you
 13 have not reached out to any of these third party
 14 groups yet about attending meetings or making
 15 presentations?
 16 A. Specific to IDPP, no.
 17 Q. Correct. Have you reached out to them
 18 specific to other things?
 19 A. Yes. As I answered before. I mean, we
 20 attend groups meetings, we, you know, set up touch
 21 points with some of the voter groups. So, you
 22 know, yes, we've been in contact with them.
 23 Q. Right. But you haven't reached out to
 24 them. And I think if you look at page 2 of this
 25 document, there's a word, it says -- if you look at

1 page 2, right under training with advocacy groups,
2 it says in October the WEC, or WEC, will invite
3 representatives. So just so I'm clear, no
4 invitations have been sent yet to third party
5 advocacy groups for meetings about IDPP?

6 A. Yes, that's correct.

7 Q. And this -- in this -- in this document,
8 you, WEC, will affirmatively send invites out
9 versus letting them come in. I understood you to
10 say earlier that in 2020 thus far you've been sort
11 of receiving invites. So this is an affirmative?

12 A. This would be an affirmative. I don't
13 know if it's entirely true that we haven't reached
14 out to groups. But this will be, yes, kind of
15 anybody that has been on our list of folks that
16 have -- we've worked with before that we would
17 reach out to them and let them know about this
18 opportunity.

19 Q. And in this context you'll be reaching
20 out to the distribution list you referenced
21 earlier?

22 A. I don't know that we formalized our plans
23 of exactly who the invitation will go to. I think
24 also we'll have to rely on some of our partners to
25 help us spread the word to interested groups as

1 well, 'cause sometimes they change from year to
2 year, campaigns, different people that are involved
3 in that space. So it's not, you know, a set data
4 distribution list.

5 Q. And do you know when in October you'll
6 send that invite to those groups?

7 A. I do not. I mean, obviously with enough
8 notice prior to the event itself.

9 Q. And you say the event. Well, are you
10 contemplating one event, are you contemplating
11 multiple events for different groups?

12 A. We're contemplating an event. And
13 usually what we do is then record them so people
14 can watch them at their leisure. But, you know, if
15 from that event somebody wanted to have further
16 discussions, we would certainly accommodate that.

17 Q. And when you record them so that people
18 can watch at their leisure, where do those
19 recordings go?

20 A. On the elections.wi.gov website.

21 Q. So any of your past events like
22 this, your past events with advocacy groups, those
23 recordings would be on that website?

24 A. We don't -- you know, I can't really
25 speak to exactly what's out there from the past.

1 But that's how we've been doing webinars even with
2 our clerks and, you know, with others now that
3 we're in a virtual world. So that's kind of our
4 format now.

5 Q. So now -- when you say now that we're in
6 a virtual world, since -- since February?

7 A. March.

8 Q. -- 2020, March?

9 A. Yeah, March, April.

10 Q. Okay. Since the pandemic. And when you
11 have these meetings you'll have these trainings
12 with the advocacy groups, you're not sure at this
13 point what they'll do afterwards with that
14 information; is that right?

15 A. Yes, that's correct.

16 Q. Right? And you don't have any control
17 over -- over whether or not they'll educate voters
18 about the IDPP process?

19 A. Correct.

20 Q. And then if we talk a little bit about
21 the clerk tool kit and the clerk aspect of this
22 training, I think you said earlier you'll hold this
23 training but you don't have -- you don't have any
24 control over what the clerks will do with that
25 information; is that right?

1 A. I mean, that's true of anything in
2 election administration. We don't have any
3 directive authority over the local election
4 officials.

5 Q. Do you have anything to track what the
6 local election officials do? Do you, for example,
7 monitor their websites? Do you check in, have
8 conversations and interact, those types of things?

9 A. There are 1,922 of them, so no, we don't
10 check in on what they're posting on their website.

11 Q. So you don't know, for example, if since
12 2016 any of the clerks have posted anything about
13 the IDPP process, or we can even call it free voter
14 ID, on their website?

15 A. I think we would know about things like
16 social media posts. If we see them post these
17 things and they're, you know, followers of ours, we
18 often will like it or share it. So I know that
19 clerks have been utilizing our social media plan
20 and some of the IDPP materials.

21 Q. Do you do anything to track how often
22 clerks post or repost your materials?

23 A. No.

24 Q. So you don't have a -- you don't have a
25 sense of how many clerks are posting or reposting

1 your materials?
 2 A. No. Someone would be welcome to do that
 3 analysis. But no, we don't.
 4 Q. And you don't know -- just so that I am
 5 clear, you don't know where -- so for example, you
 6 don't know if in Milwaukee this information has
 7 been published or if in Kenosha this information is
 8 put out?
 9 A. No. From time to time over the years if
 10 jurisdictions were doing outreach campaigns, they
 11 might let us know. Like I know previously
 12 Milwaukee County has used our materials to do their
 13 own outreach and others. But no, we don't -- we
 14 don't track it per se, 'cause they're not required
 15 to report that to us.
 16 Q. Right. And I think earlier you mentioned
 17 that the tool kit that you put out to clerks are a
 18 significant portion of your outreach because voters
 19 trust their clerks --
 20 A. Correct.
 21 Q. -- more than they trust the state, I
 22 think is what you said; is that right?
 23 A. Right. I think that's accurate. That's
 24 what the survey showed.
 25 Q. Uh-huh. But you don't do anything to

1 track and see how effective the clerks' outreach
 2 has been?
 3 A. No. Again, there's 1,922 of them.
 4 Q. And then with earned media, that's
 5 just -- you don't actually have any idea if you'll
 6 get earned media opportunities in, let's say,
 7 September or October, do you?
 8 A. Well, you know, in terms of people
 9 inviting us on to various programs and whatnot, no.
 10 But doing media availabilities, which I've
 11 committed to doing weekly and I did in April and we
 12 do quite regularly, we get a fairly decent coverage
 13 from those sorts of things. And so if we put out a
 14 schedule saying this is when I'll be available to
 15 answer questions, usually we're able to secure
 16 people being there.
 17 Q. Okay. And if you do get those invites,
 18 do you know -- do you have a sense of how many of
 19 those you'll talk about IDPP?
 20 A. No, I do not.
 21 Q. So it's possible you could get earned
 22 media opportunities and never talk about IDPP?
 23 A. It's possible, yes.
 24 Q. And it's also possible that you could get
 25 no earned media opportunities?

1 A. As much as that would help clear up my
 2 schedule, I think that's very unlikely.
 3 Q. But you don't control the content of
 4 those? Those are controlled by whoever's reaching
 5 out to you to take up some of your time and put you
 6 on the air; right?
 7 A. Correct. Although you -- you -- yes, you
 8 have some control in the content that you choose to
 9 share, so --
 10 Q. But you don't know at this point if you
 11 will definitely share any information about IDPP?
 12 A. Well, I have a scheduled media
 13 availability where that's one of the topics. So
 14 yes, there will be that.
 15 Q. That'll be on the topic, but you don't
 16 know if you have the opportunity to share anything
 17 about it or be asked about it?
 18 A. I will be giving information about IDPP
 19 as part of that media availability, yes.
 20 Q. And then I think you -- the other aspect
 21 or, like, the fourth aspect was the social media
 22 campaign. And you've acknowledged that there
 23 are -- there are folks in Wisconsin who don't have
 24 internet access?
 25 A. I don't have a direct expertise to make

1 that determination, nor do I have data about that.
 2 But, I mean, I suppose just being a person, I
 3 believe that to be true.
 4 Q. And WEC hasn't tracked that or looked at
 5 that to determine how effective its social media
 6 campaign is -- or maybe let me just strike that.
 7 WEC hasn't tracked that to determine
 8 if there are individuals who are not reached by its
 9 social media campaign?
 10 A. I believe, as we've talked about
 11 previously, there's some analytics that KW2 has
 12 provided to us previously.
 13 Q. So to your knowledge the only information
 14 about the effectiveness of the social media
 15 campaign comes from KW2's analytics?
 16 A. I believe we have analytics from our own
 17 social media pages as well, but I'm not sure how
 18 you're suggesting I would know whether the
 19 4.3 million eligible voters in Wisconsin have
 20 internet access. I don't know that.
 21 Q. I'm really just trying to get at if
 22 you're doing anything to track -- to track the
 23 effectiveness of your social media campaign through
 24 either -- through analytics or some type of review.
 25 Is there anything that your office is doing to

1 track that?

2 A. Not beyond what we do in terms of work

3 with KW2 or analytics that are provided through our

4 social media, through our websites.

5 Q. And when you talk about -- when you say,

6 like, analytics that are provided through your

7 social media and our website, those are sort of

8 like -- can you just tell me what those are, just

9 so I know how to differentiate those between --

10 A. Sure. I think, you know, with any

11 technology there's built-in tools that provide

12 analytics, Google analytics, other things about who

13 visits and whatnot. But we don't know about the

14 individuals, but we probably would have some data

15 about numbers.

16 Q. And where would that data be? Who would

17 have it? Where would it be housed?

18 A. It would be housed in those applications.

19 Q. So on your Facebook page or --

20 A. Right.

21 Q. -- on your website, for example, like

22 click numbers or things like that?

23 A. Right, correct. Google analytics.

24 Q. And that's retrievable information?

25 A. I believe so. I don't know what format

1 it takes. I don't think it's a record that

2 currently exists.

3 Q. Does anyone at WEC review that

4 information to -- to track the effectiveness of

5 your social media?

6 A. We -- we certainly review that

7 information to try to identify trends and whatnot,

8 especially traffic to our various web tools. But I

9 don't know -- yes.

10 Q. But you don't know? What is it that you

11 don't know?

12 A. I'm trying to think of how to describe

13 this. I guess in terms of analyzing that

14 ineffectiveness against other campaigns or

15 effectiveness amongst voters in Wisconsin, we don't

16 have that data to compare it to, if that makes

17 sense.

18 Q. Got it. Who would be the person who

19 would be reviewing those analytics?

20 A. It would be the -- probably our public

21 information officer and the elections specialist

22 that works on voter outreach.

23 Q. And then you don't -- you don't

24 separately track any re-Tweets or shares on social

25 media?

1 A. I don't know if that's part of the data

2 set through the analytics in the applications. I

3 don't know.

4 Q. But if it was, the person who would look

5 at that would be your public information officer?

6 A. Correct.

7 Q. So you talked a little bit -- and I think

8 we're moving away from this document -- but you

9 talked a little bit, in connection with

10 document 5013, about a 2015 assessment of needing

11 to inform voters about IDPP about six to

12 eight weeks ahead of the election. Do you recall

13 that?

14 A. Yes.

15 Q. Has WEC done any work since 2015 to

16 evaluate how long it needs to -- to launch an

17 effective campaign regarding IDPP?

18 A. I don't know what those 2015 estimates

19 were based off of. I don't think they were based

20 off of any official data or information. So no.

21 But the process has changed since then, obviously,

22 and people's awareness of it.

23 Q. So did you -- and I know it wasn't -- I

24 will say -- I will say WEC, although I know the

25 organization has changed names over the years. Was

1 any assessment done in 2016 to see how long WEC or

2 the state needed to launch an effective education

3 campaign on IDPP?

4 A. Not that I'm aware.

5 Q. What about in 2017?

6 A. Not that I'm aware.

7 Q. 2018?

8 A. No, not that I'm aware of.

9 Q. 2019?

10 A. No.

11 Q. And 2020, did you -- I know it's been a

12 different year for everyone, but in 2020 have you

13 done any -- have you launched any type of

14 assessment to evaluate how long a campaign on IDPP

15 needs to be?

16 A. No.

17 Q. So when you started the IDPP campaign, or

18 when you started in, I think it was September 19th

19 was the date that we talked about, why is that

20 campaign starting on September 19th?

21 A. To give -- and again, this is part of a

22 much larger social media plan that advises people

23 about all the mechanics of voting. To correspond

24 some of that messaging throughout the election

25 cycle. So starting with the time that ballots go

1 out, until election day, which, you know, many
2 voters don't think about the election until
3 election day. So messaging when they're getting
4 ballots, messaging near election day. We try to
5 diversify.

6 Q. And that larger campaign that you talked
7 about, have you done any type of assessment to
8 determine when that starts, when IDPP is part of
9 your larger campaign?

10 A. Yes. So as is kind of outlined in our
11 November preparation plans, this week, more or
12 less, a lot of those things will start to launch.
13 We hope to do our first media availability tomorrow
14 and, you know, do these regular educational
15 outreach efforts between now and the election.

16 Q. And you're aware that a voter who -- who
17 starts the IDPP process, that that can take several
18 weeks for them to actually obtain an ID if they do
19 obtain one?

20 MR. MURPHY: Object to form. You may
21 answer to the extent you're able.

22 THE WITNESS: I don't know what DMV's
23 current estimate for that process is.

24 BY MS. CALLAIS:

25 Q. Did you check -- did WEC check with DMV

1 to see how long it takes for a person to obtain an
2 ID through the IDPP process?

3 A. They have not made us aware of any
4 changes to the process. We do talk to them. But
5 they did not indicate there have been any changes
6 to the time frame.

7 Q. And you don't look at the time frame for
8 obtaining an ID under the IDPP when you're
9 determining how long before an election to start
10 outreach about obtaining an ID to vote, free ID?

11 A. I think we do, yes. I mean, I think we
12 do. That's why, again, it's messaged throughout.

13 Q. When you say it's messaged throughout,
14 what do you mean by that?

15 A. As is in our plan, we -- we start
16 messaging on this for November, specifically,
17 starting in September.

18 Q. And you do that based upon the length of
19 time it takes for someone to get a permanent ID
20 under the IDPP process?

21 A. I think that's one factor. It's also
22 just, again, you know, based on some of our
23 experience with voter behavior and how there might
24 be different touch points where photo ID is part of
25 their process and then they need to know that

1 information.

2 Q. You said that might be one factor, but
3 you don't know how long it takes someone, on
4 average, to obtain an ID under the IDPP process?

5 A. I don't know that anything's changed
6 since those initial analytics. Like you
7 referenced, two weeks is sort of what we had heard,
8 and we haven't heard that that's changed.

9 Q. When you say the initial analytics, just
10 so I'm clear, what are you referring to?

11 A. I believe you referenced that number, or
12 it might have come from an e-mail. I'm not sure
13 where that came from. But that sounds familiar in
14 terms of data that was provided to us by DMV. It's
15 probably more accurate to say that.

16 Q. I don't think that I referenced two
17 weeks. I was talking about a six- to eight-week
18 assessment, but it is possible. So your
19 understanding is that at some point you learned
20 from DMV that that process takes about two weeks
21 and you --

22 A. It could. I don't -- I don't want to
23 speak for DMV and their process and how Covid might
24 be changing things on their side. But I think
25 that's what we'd heard from them in conversations.

1 But I think they make efforts to expedite that
2 closer to the election so that if somebody votes on
3 election day, they are still able to get their IDPP
4 ID in time to remedy their provisional. So I don't
5 know that the two weeks is a hard rule. I think it
6 was an estimate. Kind of like seven days for a
7 ballot to get through the mail in the postal
8 service. It's an estimate.

9 Q. And then with respect to the website,
10 there were some links for radio and TV ads. And I
11 just want to make sure I was clear. You're not
12 sure if either of those radio and TV ads that were
13 on the Bring It website have actually aired on
14 radio or TV?

15 A. Oh, they certainly have, yes.

16 Q. And do you know --

17 A. Throughout.

18 Q. Do you know when they would have aired?

19 A. I'm sure we provided this in the nine
20 years of this litigation. I don't know off the top
21 of my head. But I've seen them on TV and on the
22 radio, or heard them on the radio myself before.

23 Q. Do you know where there would be records
24 of when they aired?

25 A. I'm sure it's been submitted as part of

1 the record. I don't know.
 2 Q. Have any of them aired in 2020?
 3 A. No.
 4 Q. Do you know if any aired in 2019?
 5 A. I do not believe so. Sometimes, you
 6 know, community access channels and other sources
 7 like that will use that content and air it. So I
 8 don't know. But we did not have any media buys.
 9 Q. And what about in 2018?
 10 A. I don't remember. I don't know.
 11 Q. Do you know if there was money for paid
 12 media in your budget for 2018?
 13 A. I do not believe there was, no.
 14 Q. And would you have had any media buys if
 15 there was no money for paid media in 2018?
 16 A. No. If there was -- correct, I don't
 17 think that that spending extended to 2018, no.
 18 Q. What about in 2017, do you know if those
 19 ads aired in 2017?
 20 A. I don't remember. I'm sorry.
 21 Q. Do you know if there was money for paid
 22 media buys in 2017?
 23 A. Again, I don't believe so. I'm sorry, I
 24 don't know.
 25 Q. Just so I'm clear about how the process

1 works, if you, WEC, didn't have a paid media buy,
 2 then if those things in those years ran on either
 3 the TV or radio, that would have been the choice of
 4 the public access network, I think you referred to
 5 them as?
 6 A. Yeah, correct.
 7 Q. And in 2016 -- do you know if those radio
 8 and TV ads ran in 2016?
 9 A. I believe so, but I don't remember. And
 10 I'm sure it's a record as part of this case.
 11 Q. And then earlier you were talking with my
 12 co-counsel about a targeted mailing that is going
 13 out to folks who -- this year for folks who have
 14 not yet -- and I don't -- I know it's like
 15 6.2 million voters, and I'm going to confess I
 16 cannot remember if it was -- if you're referring to
 17 absentee. Is that the target group?
 18 A. Correct. It's 2.6 million voters,
 19 approximately, who had not yet requested an
 20 absentee ballot for the -- for the November
 21 election.
 22 Q. And part of the reason that you're
 23 sending out that mailing you said was part of your
 24 statutory responsibility?
 25 A. No, that is not. It is a directive of

1 the commission. It's not a statutory
 2 responsibility. That was the ERIC process, I
 3 believe.
 4 Q. And when you say a directive of the
 5 commission, can you just -- what do you mean by
 6 that?
 7 A. The commission directed WEC staff to send
 8 a mailer to voters who had not yet requested an
 9 absentee ballot for the fall, and also to inform
 10 them about their other -- about their options to be
 11 able to cast their ballots in November and to
 12 inform them about things like voter registration
 13 and photo ID.
 14 Q. And do you know if any assessment will be
 15 done or has been done to see if a targeted mailing
 16 like that is going to be effective?
 17 A. We'll be able to see who, out of the pool
 18 of people that has been sent the mailer, who
 19 registers -- maybe re-registers to vote, who
 20 requests an absentee ballot, who sends back an
 21 absentee ballot versus going to the My Vote site.
 22 But we won't know definitively if that was a result
 23 of our mailing or if it was a behavior they would
 24 have otherwise done. So -- but we will -- we will
 25 be able to look at a pool of voters and see how

1 their records change between now and then.
 2 Q. And if you received a directive or if it
 3 was a statutory responsibility to send out a
 4 targeted mailing to, for example, people who are
 5 registered to vote but don't have a DMV-issued
 6 credential, that's something that WEC would comply
 7 with and do?
 8 A. If it was a directive, yes. I think, you
 9 know, there would be budgetary considerations. We
 10 just -- the commission just approved an almost
 11 \$600,000 lapse, mandatory lapse, of our budget
 12 yesterday. So that would, of course, be a factor.
 13 Q. Right. But a targeted mailing would
 14 be -- would certainly would be -- would cost less
 15 than just general untargeted mailings or paid media
 16 buys, for example?
 17 A. I don't know. I mean, it depends on who
 18 you're targeting. The mailer we just sent out was
 19 quite expensive and relied on a federal grant to be
 20 able to accomplish.
 21 Q. And I think you said you didn't know what
 22 percent of individuals who were registered to vote
 23 but don't have an ID card?
 24 A. Correct, I do not know.
 25 Q. But that's information that could be

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1 obtained from the voter registration records; is
 2 that right?
 3 A. I believe so. It would be data that
 4 someone could purchase a custom data request from
 5 the Badger voter system.
 6 Q. And you also spoke briefly with
 7 co-counsel about the 180-day requirement for
 8 temporary receipts. And you said you didn't know
 9 if that had changed; is that right?
 10 A. Yes, my -- my -- I used to know this like
 11 the back of my hand, but my -- my knowledge on that
 12 was a little rusty. So I -- I don't know. I have
 13 no reason to believe it wasn't accurate, but I
 14 don't know.
 15 Q. Right. I guess my question is who in
 16 your agency is responsible for knowing if the law
 17 changes on IDPP specifically with respect to the
 18 time period for temporary receipts?
 19 A. Sure. So all of us would, but I think in
 20 terms of updating our materials would be the staff
 21 that works on the voter outreach programs.
 22 Q. And are you aware that your website
 23 currently, the Bring It website, currently
 24 instructs voters that if they receive a temporary
 25 ID, it will last for 180 days?

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1 exhibit, and it's doc 21 in the system. And we can
 2 mark that -- I think we're at 5017 now, Ms. Wolfe.
 3 Are you familiar with this document?
 4 Have you seen it before?
 5 A. Yes. I believe that's the 2016 report
 6 filing that we submitted with the court.
 7 Q. Okay. And so let's just go ahead and
 8 we'll just go through this. Let's start at item
 9 number one, where it says DMV training. And some
 10 of this -- I'm going to go through this, Ms. Wolfe,
 11 just sort of item by item just to make sure I
 12 understand what you have knowledge and what you
 13 don't. If you don't have knowledge about a
 14 particular thing as it pertains to the DMV, just
 15 let me know.
 16 MR. MURPHY: Counsel, we're now five
 17 minutes from our scheduled end time. Are we close
 18 to wrapping up?
 19 MS. CALLAIS: So Mike, I'm just going to
 20 go through this document. And it's the last thing
 21 I have questions about. So it just depends on how
 22 long it takes us to get through this document. But
 23 I don't have any documents or anything after that.
 24 MR. MURPHY: So you're going to go -- I
 25 mean, just so we have -- it's 14 pages. You're

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1 A. I do not know. I don't know. I'd have
 2 to review it.
 3 Q. To your knowledge, no one has made an
 4 update or change to the website regarding the time
 5 period for temporary receipts?
 6 A. I believe they have, yes. But if we
 7 missed a spot, that's entirely possible. But
 8 there's a lot of content, and we have three
 9 websites. So I believe -- I believe they have all
 10 been updated.
 11 Q. And if the time period had changed back
 12 to 60 days within the last month, and your website
 13 does not reflect that, then voters who registered,
 14 then voters who have started the IDPP process
 15 within the last month would not have had accurate
 16 information about how long their temporary receipt
 17 would last?
 18 A. I can't -- I can't answer that. I don't
 19 know where -- if you're saying that there's
 20 something wrong with the website, I mean, we would
 21 certainly get that corrected and make sure that
 22 it's consistent throughout.
 23 Q. If we have time we'll -- we can -- we can
 24 try to pull that up. But why don't we go ahead and
 25 take a look at now what is doc -- it'll be a new

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1 going to go line by line through 14 pages in five
 2 minutes?
 3 MS. CALLAIS: I'm going to go item by
 4 item. I don't know how -- I don't know that -- I
 5 mean, it just depends, right, on how much
 6 discussion.
 7 MR. MURPHY: Okay. You know --
 8 MS. CALLAIS: -- fairly quick answers,
 9 some of them could be longer, but --
 10 MR. MURPHY: As we talked about,
 11 Ms. Wolfe has got extraordinary demands on her
 12 right now, and we asked in advance that this be
 13 limited from nine to noon. I'm certainly not going
 14 to ask that we stop at noon on the dot, but please
 15 do try to work within the time constraints that we
 16 previously agreed on.
 17 THE WITNESS: I do have a meeting at
 18 noon, as a matter of fact, with KW2, so --
 19 MS. CALLAIS: So it's my understanding,
 20 Mike, I was not on the call, but it's my
 21 understanding that we certainly said we would do
 22 our best but that we haven't agreed that we only
 23 have three hours. I mean, I have this document to
 24 get through. And I'll go as fast --
 25 MR. MURPHY: I can pull up my

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1 confirmation if you want. It said nine to noon. I
 2 don't know -- I don't know what Ms. Wolfe has got
 3 exactly at noon, but that was the agreement. We'll
 4 do everything we can, you know, we'll continue to
 5 be cooperative, but nine to noon was the confirmed
 6 time.
 7 MS. CALLAIS: So, I mean, if we need to
 8 get off at noon for Ms. Wolfe's engagement and come
 9 back, held open, but the rest of my questions just
 10 pertain to this document and what's been done in
 11 response to it, so --
 12 MR. MURPHY: I can't promise we can come
 13 back on. Please get started. We'll do what we
 14 can.
 15 BY MS. CALLAIS:
 16 Q. So let's go ahead and look at item one,
 17 DMV training. And it says on this I believe you
 18 will require all field staff to complete two rounds
 19 of additional training on IDPP before the election.
 20 And this was in 2016.
 21 Ms. Wolfe, do you know if that took
 22 place?
 23 A. I don't know.
 24 Q. Okay. And just so that I am clear, part
 25 of -- sort of the -- do you know or not, is that

1 because this is DMV that would have done that?
 2 A. Yes, this is DMV, right.
 3 Q. And does DMV talk to you about the
 4 trainings that they perform or any of the trainings
 5 that they do?
 6 A. This was in 2016, so I don't know. Maybe
 7 they did. I don't know.
 8 Q. Okay. Do you know if trainings like
 9 this, or has DMV informed you if they have done
 10 additional rounds of training with their staff
 11 since 2016 and 2017, for example?
 12 A. I don't know. I don't know what they've
 13 done in 2016 and 2017.
 14 Q. Okay. And so you haven't been informed
 15 of any DMV trainings, you don't -- since 2016?
 16 A. I have not personally, no.
 17 Q. Okay. We can move down to the next page.
 18 Let's go down again to page 3. Okay. So if we
 19 look at item one, where it says "WEC will print
 20 color copies of the court-approved IDPP palm card
 21 and distribute 2000 copies to Milwaukee, 1000 each
 22 to the following organizations."
 23 Do you, Ms. Wolfe, know if this was
 24 done in 2016?
 25 A. It was done. I did it myself.

1 Q. Okay. And what about in 2017?
 2 A. I do not -- I don't believe so. I can't
 3 remember. I know many of these boxes still sit in
 4 our office to this day 'cause nobody wanted them.
 5 Q. Do you know if there was other outreach,
 6 maybe not in the form of these printed copies, but
 7 other outreaches specifically aimed at the city of
 8 Milwaukee?
 9 A. Yes. I believe that Milwaukee did their
 10 own outreach efforts utilizing a lot of our
 11 materials. I also know -- I know over the years
 12 we've submitted, too, our lists of presentations
 13 and other outreach that we've done. I mean, I've
 14 personally delivered posters, ID and IDPP
 15 information to libraries and community centers and
 16 groups that I've worked with over the years.
 17 Q. And are those specifically -- I know you
 18 said groups that you've worked with over the years,
 19 but do you know or have a record of, you know, how
 20 many posters were distributed in 2017, for example?
 21 A. If we did have a record of it, it's been
 22 submitted as part of the record for this case, so I
 23 don't know. I don't have that in front of me,
 24 obviously.
 25 MR. MURPHY: Counsel, excuse me. I do

1 want to note it's now noon. The confirmation for
 2 this deposition, an e-mail that you were on,
 3 indicated that Ms. Wolfe was available from
 4 nine a.m. to noon. And her next meeting is
 5 relating to the outreach programs. It's exactly
 6 the subject of this deposition. If she can stay
 7 on, I can, but we're now over the time and taking
 8 away from the work that is the subject of this
 9 deposition.
 10 MS. CALLAIS: So I think the question for
 11 Ms. Wolfe is if she can stay on. If Ms. Wolfe
 12 needs to leave and we have to hold the deposition
 13 open, that's -- till I move through this document,
 14 then that's fine.
 15 MR. MURPHY: I cannot promise we can come
 16 back.
 17 THE WITNESS: Yeah, you're welcome to
 18 look at my calendar. I mean, it is literally
 19 booked from the time I wake up till the time I go
 20 to bed. So I don't know that we have another
 21 opportunity. I can stay on for a few more minutes,
 22 but I will be late for that meeting.
 23 MR. MURPHY: We're doing this discovery
 24 under extraordinary time demands, cooperatively
 25 without notice, and we're cooperating the very best

1 we can, but --

2 MS. CALLAIS: Mr. Murphy, I am not
3 doubting your cooperation. But every minute we
4 argue about this is a minute I'm not asking
5 questions. I'm trying to move through this as
6 quickly as we can.

7 MR. MURPHY: And she's not working --
8 it's a minute that she's not working with her media
9 team. I can stay on as long as folks can -- other
10 folks can.

11 MS. CALLAIS: I think, Ms. Wolfe, it's
12 just the question if you're able to stay on.

13 THE WITNESS: Could we say another 15
14 minutes? I mean, I would like to be able to join
15 this meeting at least to direct the progress that
16 we're making on the media stuff. So I -- you know,
17 I'd like to get into that as soon as I can. So
18 let's say another 15 minutes.

19 BY MS. CALLAIS:

20 Q. Okay. So let's just keep moving. So
21 Ms. Wolfe, do you have any record of how much
22 outreach specifically to these groups, Vote Riders,
23 Citizen Action, One Wisconsin, League of Women
24 Voters, that WEC has done in 2018?

25 A. Again, if we do have records of that,

1 it's been submitted as part of the record in this
2 case.

3 Q. And I'm asking -- I'm asking these
4 questions, Ms. Wolfe, because when I looked through
5 the documents that we were given, I saw documents
6 for 2020. And then obviously we have a record
7 before.

8 So what I'm trying to get at is this
9 period of 2017, '18 and '19, what was the outreach
10 that WEC has done to these third party groups, and
11 if there's any record of that that we could look at
12 to assess.

13 A. I don't have any documentation available
14 to me right now. I don't know that that exists.

15 Q. Yeah. And Ms. Wolfe, you mentioned that
16 you keep a calendar. Did you keep a calendar of
17 the engagements that you have or did your staff
18 keep a calendar of the engagements that it has with
19 advocacy groups or clerks' offices over the years?

20 A. Like I assume anybody does, we have
21 Outlook calendars, is what I was referencing.

22 Q. So if you had a meeting with Vote Riders,
23 for example, or the League of Women Voters, if you
24 attended that, that would be on your calendar?

25 A. In theory, yes. Certainly could be

1 things that aren't on there, but yes.

2 Q. Is there a centralized calendar for the
3 team, for example, like a team calendar that shows
4 all of your advocacy meetings that you attend, or
5 clerks' meetings?

6 A. No.

7 Q. Do you document in any other way if you
8 send out print copies or even electronic copies to
9 the groups that are listed on this form: Vote
10 Riders, Citizen Action, Wisconsin League of Women
11 Voters, et cetera? Have you documented that from
12 2017?

13 A. No, no. I don't know that -- unless it's
14 been submitted as part of the record in this case,
15 I don't know that we have anything different that
16 way.

17 Q. And to your knowledge you haven't
18 specifically printed out copies of the palm cards
19 since 2016 to give out to these groups or the
20 cities as well?

21 A. I believe that's accurate. I don't
22 recall if that was something we did in 2018. I
23 don't recall.

24 Q. And we talked earlier about I know you
25 pulled together that IDPP plan or sort of the

1 specific outreach you've done that it would focus
2 on IDPP in November. Do you have a similar
3 document that pulls together the outreach that you
4 did in 2018, for example?

5 A. I believe we have a social media plan for
6 ourselves and our clerks, yes.

7 Q. And that social media campaign for
8 yourselves and your clerks, do you have any
9 documentation of the kits that would have been sent
10 in 2018 to local clerks, for example, and then when
11 your meetings with them would have been?

12 A. I believe we would have documentation of
13 the kits that were sent to the clerks. Our voter
14 outreach tools would be available on our website.
15 In terms of meetings, you know, our training is
16 scheduled on our website; you can see the various
17 trainings that have happened. But I don't know
18 that we specifically call out that, you know, in
19 this training we'll be talking about IDPP.

20 Q. Okay. And then the outreach you're doing
21 specifically in Milwaukee, Kenosha, and Racine, for
22 example, that outreach is the same outreach that
23 you talked about when we talked about that earlier
24 document? It's just submitting the kits and having
25 webinars?

1 A. And social media plan, earned media, all
 2 the things that we do on a regular basis. We
 3 looked at some press releases today.
 4 Q. Right. But outside of that, you don't do
 5 specific outreach or additional outreach to
 6 these -- to these localities?
 7 A. I mean, not just specifically on IDPP.
 8 We talk to them quite regularly. They just
 9 submitted their November preparedness plans. But
 10 no, not IDPP specific.
 11 Q. If you go down to, I think it's the next
 12 page. If we can go -- can we go up a little bit
 13 on -- I can only see item six. And what I'm trying
 14 to see is the whole page on four, just so I
 15 can -- so item number five, where it says "WEC will
 16 send an electronic version of the IDPP palm card to
 17 municipal clerks with instructions," that was in
 18 2016. Has that been done in subsequent years?
 19 A. The IDPP palm card is always available
 20 for clerks to continue to use. But no, we haven't
 21 posted those instructions since 2016.
 22 Q. Okay. And so when you say it's always
 23 available, it's available for -- is it just
 24 downloaded on your website?
 25 A. Yes, to print.

1 though, voters can still apply for an ID or through
 2 the IDPP process?
 3 A. Of course.
 4 Q. And then if we look at item number six.
 5 It'll say, "WEC will invite each of the following
 6 groups of individuals to attend an in-person
 7 meeting during the week of October 24th to discuss
 8 outreach." So you might have to go up a little
 9 bit.
 10 Do you know if meetings took place
 11 with these groups for particular localities in the
 12 years between 2016 and now? I know we talked a bit
 13 about what you'll be doing in 2020, but
 14 specifically what happened 2017, '18, and '19.
 15 A. So in 2016 we had a meeting in our office
 16 where we provided the materials to the groups.
 17 Again, they did not want the materials. But we
 18 have not had that same meeting in 2017, 2018, 2019.
 19 We've, you know, certainly talked with those groups
 20 on an ongoing basis.
 21 Q. And when you've talked with those groups,
 22 those have been in those conversations where
 23 they've invited you to talk to them?
 24 A. We've also had some in our office. Now,
 25 I know -- again, sometimes I don't know what the

1 Q. Okay. And when you send clerks -- when
 2 you talk about the kit that you send clerks, does
 3 it remind them of the palm card? Does it focus on
 4 the palm card and let them know that it's there?
 5 A. It will be listed amongst the resources
 6 that they have to reach out to voters with other
 7 photo ID information, with the absentee or the
 8 Covid information that we'll be sending them, yes.
 9 Q. But they're not getting a physical copy
 10 of it?
 11 A. No, they're not getting a physical paper
 12 copy of it.
 13 Q. And they're not getting -- like do you
 14 send them a link to it?
 15 A. It would be more or less, I guess, an
 16 index of resources. So yes, a link, yes.
 17 Q. And they've gotten that kit -- have you
 18 sent that sort of index of resources every single
 19 year?
 20 A. I don't -- no, I don't know. I think --
 21 I know that our intent is always to have that
 22 available, but I don't know that in 2017, where
 23 there wasn't a general election, I'm not sure that
 24 we did.
 25 Q. Even when there's not a general election,

1 terminology is for these sort of consortiums of
 2 groups, but I think it was on the -- under the
 3 umbrella of Wisconsin Voices, perhaps, where a lot
 4 of the Vote Riders or League of Women Voters have
 5 come to our office and we've had discussions about
 6 their voter outreach plans, answered questions.
 7 And that's something where we've proactively
 8 reached out to them to set those up.
 9 Q. And how often have you had those meetings
 10 each year?
 11 A. I couldn't say for sure. It really
 12 depends on what's going on or, you know, what --
 13 what we have to discuss.
 14 Q. Those meetings would be the type of
 15 things that you would calendar?
 16 A. Most likely, yes.
 17 Q. And do you put out any sort of public
 18 announcement of those meetings or do you just reach
 19 out to your specific distribution group?
 20 A. You know, I don't want to paint it as if
 21 it's some set-in-stone thing that looks the same
 22 every time. So no -- no, we don't do media on our
 23 meetings.
 24 Q. Go down to the next page. Whenever you
 25 contact these groups, this talks specifically about

1 making personal communications by phone and
2 whatnot. In the years between 2017 and -- and 2019
3 have you made those invitations by phone, has it
4 been by e-mail? How has that taken place?

5 A. I don't recall. I don't know the method
6 with which I reached out. I mean, it depends on
7 the group or the individuals coordinating it, how
8 we communicate.

9 Q. Do you know how you'll be making those
10 invitations for your 2020 meeting with these
11 groups?

12 A. Well, the nice thing about virtual
13 meetings is you can do a little more virtual
14 publicity too. So I don't know that we've
15 completely solidified how we'll make those
16 arrangements, but I would anticipate it would
17 involve phone calls and e-mail communication.

18 Q. And then for item number seven there it
19 says that "WEC will contact radio and TV programs
20 and offer to be interviewed." Is that -- would
21 that item be part of the earned media that you
22 talked about in your current plan?

23 A. Yes.

24 Q. And do you have a record, Ms. Wolfe, of
25 how many interviews you've done since -- between

1 2017 and 2019?

2 A. No. I mean, no. I don't have a record
3 of that. And also it wouldn't just be me, it would
4 be our public information officer, commissioners,
5 you know, sometimes staff. So no.

6 Q. So you don't track how many -- you know,
7 how many of those interviews you would have had
8 that would have been specific to IDPP in any given
9 year?

10 A. I can't imagine we had media that wanted
11 to talk to us specifically about IDPP. But we've
12 certainly done many interviews where that's come up
13 in terms of an option for people for photo ID.

14 Q. Do you know how many interviews you've
15 had that would have focused on photo ID generally?

16 A. Again, photo ID isn't a stand-alone
17 issue; it has to be in context of what the voter is
18 trying to accomplish. So if we're talking about
19 absentee voting and it's photo ID and the options
20 for a voter, that would be part of the
21 conversation.

22 Q. And then if we look at -- oh, and I guess
23 I should ask if you had those types of interviews,
24 are those things that would be on a calendar that
25 would be calendared for you or your staff?

1 A. In theory. You know, I wouldn't paint
2 our calendars as perfect. Sometimes people are
3 better or worse about, you know, sending us a
4 calendar invite versus calling us and writing it on
5 a Post-it note. But for the most part I kind of
6 live by my calendar, yes.

7 Q. And then item number eight where it says
8 "WEC will issue a new press release concerning
9 IDPP," this -- I know we talked about some press
10 releases as part of your -- as part of your plan
11 for 2020, but press releases that WEC has issued
12 since 2016, would those be available on the
13 website?

14 A. Yes, they would.

15 Q. Okay. So if we were looking for a record
16 of how many press releases that you issued about
17 IDPP, we could look at WEC's website to see that,
18 or the Bring It website to see how many have been
19 issued?

20 A. Yes. The elections website under News.

21 Q. Okay. Let's go down -- so let's go to
22 the next page, page 6.

23 MR. MURPHY: Counsel, could you give us
24 an estimate? We're now at quarter after. She's
25 more than 15 minutes late for her meeting with the

1 advertising agency.

2 MS. CALLAIS: The only questions I have
3 are just related to the few items on here, just
4 WEC -- there was a discrepancy about, and just to
5 see if WEC has done or is planning to do any of
6 them. So I think it should be quick.

7 MR. MURPHY: Okay.

8 BY MS. CALLAIS:

9 Q. So if we look at item number two on this
10 page, Ms. Wolfe, where it says "Send a mailing to
11 all individuals that WEC and the DMV can identify
12 as being registered to vote, but not possessing a
13 Wisconsin ID," I just want to verify: That has not
14 happened from 2016 to today and you don't
15 anticipate doing that in 2020?

16 A. That has not been something that has been
17 required of us nor has the commission considered.

18 Q. Okay. So let's go to the next page.
19 Next page -- sorry. Well, it might be -- I just
20 can't see. I think the screen size is a little
21 different, so it's hard for me to see. I think
22 we're on the same item. Next page.

23 And just to confirm, if you look at
24 item number four, WEC, over the course of the last
25 four years, has not rented any billboards in

1 Milwaukee or other -- other locations to advertise
2 about IDPP?
3 A. I don't know when the last billboard came
4 down. But no, we haven't made any additional
5 purchases of rental space on billboards.
6 Q. Are you aware of any purchases that WEC
7 has ever made of billboard space with respect to
8 IDPP?
9 A. We had billboards. I don't know. That,
10 again, I would assume is part of the record.
11 Q. So if it's not in the record that you had
12 done that in 2016, you don't know if -- you don't
13 recall doing it from 2017, forward?
14 A. I do recall doing -- working on
15 billboards, but I don't recall if that ever came to
16 fruition or if it was -- you know, there were -- I
17 don't -- I don't remember. I know we had
18 billboards designed.
19 Q. But you currently don't have any
20 billboards up, you know that?
21 A. Correct. Unless there's one out there
22 that I'm not aware of.
23 Q. Unless someone else put up a billboard.
24 A. Yeah.
25 Q. So let's go to the next page. I think we

1 can go to the next page, 'cause -- and then let's
2 go to the next page.
3 MS. CALLAIS: Yeah, so I think that is
4 all that I have, Ms. Wolfe.
5 THE WITNESS: Okay.
6 MS. ROTKER: I'm good. And I appreciate
7 you staying and getting this done and taking time
8 out of your busy day. But I'm ready to say let's
9 go off the record and let you get to what you need
10 to do.
11 THE WITNESS: Thank you.
12 THE VIDEOGRAPHER: Time is 12:20 p.m.
13 Central time, and we are now off the record. This
14 ends today's deposition.
15 COURT REPORTER: The transcript has been
16 ordered expedited and a rough. Would you like to
17 receive those?
18 MR. MURPHY: Yeah, please. Same as they
19 get.
20 (Deposition concluded at 12:20 p.m.)
21
22
23
24
25

1 STATE OF WISCONSIN)
2) ss.
3 COUNTY OF MILWAUKEE)
4 I, ANITA KORNBURGER, Registered
5 Professional Reporter and Notary Public in and
6 for the State of Wisconsin, do hereby certify
7 that the preceding deposition was recorded by
8 me and reduced to writing under my personal
9 direction.
10 I further certify that said deposition was
11 taken remotely, with all parties appearing by
12 videoconference, on September 2, 2020,
13 commencing at 9:01 a.m. and concluding at 12:20
14 p.m.
15 I further certify that I am not a relative
16 or employee or attorney or counsel of any of
17 the parties, or a relative or employee of such
18 attorney or counsel, or financially interested
19 directly or indirectly in this action.
20 In witness whereof, I have hereunto set my
21 hand and affixed my seal of office at
22 Milwaukee, Wisconsin, this 7th day of
23 September, 2020.
24 ANITA KORNBURGER, RPR - Notary Public
25 My commission expires May 24, 2021.

1 SIGNATURE PAGE OF MEAGAN WOLFE
2 Page Line Should be Changed to Read
3 _____
4 _____
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18
19 I, MEAGAN WOLFE, hereby certify that I have read
20 the transcript of my testimony taken under oath and that the
21 transcript is a true and complete record of my testimony, and
22 that the answers on the record as given by me are true and
23 correct.
24 _____
25 MEAGAN WOLFE
Sworn to before me
this ____ day of _____, 2020

Notary Public

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